Title	Safeguarding and Child Protection
Associated Policies	- Anti-Bullying (TPO/STU/01) - Behaviour and Discipline (TPO/STU/03) - Complaints (TPO/QA/02) - Disciplinary Procedure (TPO/STA/22) - Safer Recruitment, SCR and Staff Files (TPO/STA/03) - Professional and Safe Conduct (TPO/STA/10) - Special Educational Needs and Inclusion (TPO/STU/05) - Recruitment and Induction (TPO/STA/27) - Training and Development (TPO/STA/18) - Whistle Blowing (TPO/STA/19) - Online Safety (TPO/STU/12) - Data Protection (TPO/STA/25) - Single Equality (TPO/EO/01) - Home Academy Agreement - Dealing with Allegations Against Staff (TPO/STA/21) - Relationship Education, Relationships and Sex Education and Health Education Policy (TPO/STU/10)

REVIEWED: September 2024   **NEXT REVIEW: SEPTEMBER 2025** *Or sooner if required*

Contents

Document Control

Date of last review:	September 2024	Author:	Head of Safeguarding
Date of next review:	September 2025	Version:	10
Approved by:	Board of Directors	Status:	Draft

Summary of Changes

Summary of Changes (February 2024)
- References to Working Together to Safeguard Children (2023) throughout
- References to Early Years Foundation Stage (2024) throughout
- References to Prevent Duty Guidance (2023) throughout
- Added Trust Safeguarding Advisor roles and responsibilities *(Section 1; Section 6.21)*
- Updated definition of safeguarding in line with Working Together (2023) *(Section 5.1)*
- Updated definition of abuse *(Section 5.4)* and Neglect *(Section 5.5)* in line with Working Together to Safeguard Children (2023)
- Emphasised the importance of involving the child and family in early help and expanded the groups of children who may benefit from early help *(Section 7.10)*
- Updated expectations in relation to radicalisation and extremism to reflect the revisions to the Prevent Duty (2023) *(Section 8.4)*
- Emphasised that staff will not take pictures or recordings of pupils using any electronic devices with imaging and sharing capabilities *(Section 14.5)*

Summary of Changes (September 2024)
- Safeguarding Trustee details updated *(Section 1.2)*
- MASH and LADO contact details updated *(Section 1.3; 1.4)*
- Academy DSL information updated *(Section 1)*
- Academy contextual safeguarding priorities updated *(Appendix C)*
- Expanded the policy aims to reflect harms inside and outside of the home, including online, with an emphasis on early help *(Section 2.2)*
- References to Keeping Children Safe in Education (2024) throughout
- Added reference to exploitation alongside abuse and neglect, throughout
- Added additional references to guidance and legislation, including Use of Reasonable Force, Information Sharing and The Prevent Duty *(Section 4.3)*
- Updated the roles and responsibilities of Local Governing Bodies *(Section 6.7 – 6.10)*
- Clarified that Safeguarding Governors will produce a written report to the LGB following Safeguarding Governor Visits *(Section 6.8)*
- Clarified that monitoring of Governor confirmation of KCSIE sign off will be undertaken by the Trust Governance Team *(Section 6.9)*
- Expanded the definition of Early Help and list of vulnerabilities that staff should be particularly mindful of when identifying children who may be in particular need of early help *(Section 7.10)*
- Updated guidance in relation to Radicalisation and Extremism, including the definitions of Extremism *(Section 8.4)*
- Clarified that any sexual activity involving under-13s must be reported to police and social care *(Section 9.5)*
- Added additional information regarding children who are lesbian, gay, bisexual or gender questioning *(Section 10.3)*
- Clarified that the role of the Designated Teacher includes promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangements orders *(Section 10.5)*
- Clarified that safeguarding supervision for DSLs and DDSLs will take place at least half-termly *(Section 11.7.1)*

- Expanded guidance on Alternative Provision, including the roles and responsibilities of commissioning academies *(Section 13)*
- Added additional information in relation to confidentiality and information sharing *(Section 19)*
- Added guidance on reporting concerns for staff who work across multiple sites, or in circumstances where CPOMS is unavailable *(Section 20.3)*, including a standardised paper reporting form *(Appendix E)*

Introduction

1.	Key Contacts for Safeguarding at Brooke Weston Trust

1.1 Academy-level contacts, including the Principal, Designated Safeguarding Leads (DSL) and Deputy Safeguarding Leads (DDSL), are on pages 7-8.

1.2 The Safeguarding Trustee, Safeguarding Strategic Lead for Brooke Weston Trust (BWT) and the Safeguarding Advisors can be contacted using the details below:

Safeguarding Trustee:	**Primary Phase Safeguarding Advisor:**
Sam Godfrey governance@brookewestontrust.org	Sarah Fleming
Trust Head of Safeguarding:	Sarah.Fleming@beanfieldprimary.org
James Down james.down@brookewestontrust.org	01536 262000
07841 199080	**Secondary Phase Safeguarding Advisor:**
Trust Safeguarding Advisor:	Alex Merry
Lucy Warn lucy.warn@brookewestontrust.org	alexandra.merry@ketteringscienceacademy.org
07547105668	01536 396366

1.3 **The Multi-Agency Safeguarding Hub (MASH)**
The MASH team can advise on whether a family needs early help or whether they meet the threshold for statutory child protection. They can be contacted by members of staff or parents/carers.
- North Northamptonshire
    - Telephone:0300 126 7000 (Option 1)
    - Referral Form can be accessed here
    - The Partnership Support Service can provide advice and guidance in relation to Early Help Assessments and can be contacted via telephone (01604 526963) or email (CFSS@nctrust.co.uk)
- Cambridgeshire:
    - Telephone: 0345 045 5203
    - Referral Form can be accessed here

1.4 **Local Authority Designated Officer (DO)**
North Northamptonshire
Consultation email: LADOConsultations@NCTrust.co.uk Telephone: 07850 854309 / 07831 123193
Consultation requests and referrals can be made using the Online LADO Referral Form, which can be accessed here.
More information can be found at http://www.northamptonshirescb.org.uk/schools/referrals-eha/
Cambridgeshire
Email: LADO@cambridgeshire.gov.uk Telephone 01223 727967
https://www.safeguardingcambspeterborough.org.uk/children-board/professionals/lado/

1.5 **Out of hours service**
Should you need to contact children's Social Care urgently during the evening, at night or at the weekend, phone the out of hours team on 01604 626938 (Northamptonshire) or 01733 234724 (Cambridgeshire). An operator will answer the phone and take details of the problem and your contact details. They will then pass this information over to the duty social worker.

1.6 **Whistleblowing Officer**
The Trust Whistleblowing Officer is James Down (james.down@brookewestontrust.org) 07841 199080.
If the concern relates to the Whistleblowing Officer, concerns should be reported to the CEO (andrew.campbell@brookewestontrust.org).

1.7 Other contacts
- Professional Online Safety Helpline 0344 381 4772 or helpline@saferinternet.org.uk
- NSPCC 0808 800 5000 or help@nspcc.org.uk – 24-hour service.
- Childline 0800 1111 https://www.childline.org.uk/
- Police 101 or 999 in emergency

1.8 Safeguarding Adults
An adult at risk is defined as any person who is 18 and over, needs care or support, is experiencing, or is at risk of, abuse or neglect, and as a result of their needs is unable to protect themselves against the abuse or neglect. Contact details for the Safeguarding Adults Teams can be found below:
- North Northamptonshire: 0300 126 3000 (Online Referral Form can be accessed here)
- Cambridgeshire: 0345 045 5202 (Online Referral Form can be accessed here)

BWT Primaries *(Contextual safeguarding priorities can be found in Appendix C).*

	Beanfield Primary Academy – 01536 262000		Compass Primary Academy – 01536 532707	
Principal	Sam Eathorne	Samantha.eathorne@beanfieldprimary.org	Jo Fallowell	Jo.fallowell@compassprimary.org
DSL	Sarah Fleming	Sarah.fleming@beanfieldprimary.org	Callum Reilly	Callum.reilly@compassprimary.org
Deputy DSLs	Sam Eathorne	Samantha.eathorne@beanfieldprimary.org	Jo Fallowell	Jo.fallowell@compassprimary.org
	Gemma Cushing	Gemma.cushings@beanfieldprimary.org	Nicole Andrews	Nicole.andrews@compassprimary.org
	Chelsea Harley	Chelsea.harley@beanfieldprimary.org	Dawn Gillett	Dawn.gillett@compassprimary.org
			Kate Strudwick	Kate.strudwick@compassprimary.org
DSL Trained Staff	Declan Byrne	declan.byrne@beanfieldprimary.org	Bex Holmes	Bex.holmes@compassprimary.org
	Charlotte Bright	Charlotte.Bright@beanfieldprimary.org	Hannah Layram	Hannah.layram@compassprimary.org
			Tina Currall	Tina.currall@compassprimary.org
Safeguarding Governor	TBC	governance @brookewestontrust.org	TBC	governance @brookewestontrust.org
	Gretton Primary Academy – 01536 770366		**Oakley Vale Primary Academy – 01536 461199**	
Principal	Julia Dickinson	Julia.dickinson@grettonprimary.org	Sarah Sanders	Sarah.sanders1@oakleyvaleprimary.org
DSL	Julia Dickinson	Julia.dickinson@grettonprimary.org	Fran Dunn	Frances.dunn@oakleyvaleprimary.org
Deputy DSLs	Jess Smith	Jessica.smith@grettonprimary.org	Ruth Eaton	Ruth.eaton@oakleyvaleprimary.org
	Kerry Young	Kerry.young@grettonprimary.org	Becky Annetts	Rebecca.annetts@oakleyvaleprimary.org
			Sarah Sanders	Sarah.sanders1@oakleyvaleprimary.org
			Gareth Thomas	gareth.thomas@oakleyvaleprimary.org
DSL Trained Staff	Paula Crawford	Paula.crawford@grettonprimary.org	N/A	N/A
	Sarah Block	Sarah.block@grettonrpimary.org		
Safeguarding Governor	Beanie Turner	governance @brookewestontrust.org	Hannah Starkey	governance @brookewestontrust.org
	Peckover Primary Academy – 01945 584741		**Thrapston Primary Academy – 01832 732512**	
Principal	Kate Kendal	Kate.kendal@peckoverprimary.org	Pauline Turner	Pauline.turner@thrapston.net
DSL	Louise Tombleson	Louise.tombleson@peckoverprimary.org	Pauline Turner (Interim)	Pauline.turner@thrapston.net
			Kristina Graham (on Leave)	Kristina.graham@thrapston.net
Deputy DSLs	Esther Fletcher	Esther.fletcher@peckoverprimary.org	Sharon Webb	Sharon.webb@thrapston.net
	Rachel Sutton	Rachel.sutton@peckoverprimary.org	Claire Golding	Claire.golding@thrapston.net
	Helen Foad	Helen.foad@peckoverprimary.org	Julie Gothard	Julie.Gothard@thrapston.net
	Samantha McGovern	Samantha.mcgovern@peckoverprimary.org		
	Charlotte Salter	Charlotte.salter@peckoverprimary.org		
	Kate Kendal	Kate.kendal@peckoverprimary.org		
DSL Trained Staff	N/A	N/A	Sarah McMurdo	Smcmurdo@thrapston.net
			Liam Crook	lcrook-chambers@thrapston.net
Safeguarding Governor	TBC	governance @brookewestontrust.org	Fiona McGill	governance @brookewestontrust.org

BWT Secondaries *(Contextual safeguarding priorities can be found in Appendix C).*

	Brooke Weston Academy – 01536 396366		Corby Business Academy – 01536 303120	
Principal	Clare Haworth	clare.haworth@brookeweston.org	Simon Underwood	Simon.underwood@corbybusinessacademy.org
DSL	Kate Jeyes	Kate.jeyes1@brookeweston.org	Amy Harris	Amy.harris@corbybusinessacademy.org
Deputy DSLs	Sara Mangan Steph Schofield	Sara.mangan@brookeweston.org Steph.schofield@brookeweston.org	Donna Lapsley Michelle Bruce Kayleigh Stevenson Caren Brown	Donna.lapsley@corbybusinessacademy.org Michelle.bruce@corbybusinessacademy.org Kayleigh.stevenson@corbybusinessacademy.org Caren.brown@corbybusinessacademy.org
DSL Trained Staff	Angeline Annable Vicky Hilling	Angeline.annabele@brookeweston.org Vicky.Hilling@brookeweston.org	Kerry Prior Richard White Elliott Hanna Claire Robinson	Kerry.prior@corbybusinessacademy.org Richard.white@corbybusinessacademy.org Elliott.hanna@corbybusinessacademy.org Claire.robinson@corbybusinessacademy.org
Safeguarding Governor	Ryan Coleman	governance @brookewestontrust.org	Niel Aveyard	governance @brookewestontrust.org
	Corby Technical School – 01536 213100		Kettering Science Academy – 01536 532700	
Principal	Angela Reynolds	Angela.reynolds@corbytechnicalschool.org	Jennifer Giovanelli	jennifer.giovanelli@ketteringscienceacademy.org
DSL	Danielle Eddy	danielle.eddy@corbytechnicalschool.org	Alex Merry	alexandra.merry@ketteringscienceacademy.org
Deputy DSLs	Laurence Scott Emma Toye	Laurence.scott@corbytechnicalschool.org Emma.toye@corbytechnicalschool.org	Liz Weller Beth Corby Chloe Johnson	elizabeth.weller@ketteringscienceacademy.org beth.corby@ketteringscienceacademy.org chloe.johnson@ketteringscienceacademy.org
DSL Trained Staff	Anna Jenkins Ben Armstrong Jacob Toye	Anna.jenkins@corbytechnicalschool.org Ben.armstrong@corbytechnicalschool.org Jacob.toye@corbytechnicalschool.org		
Safeguarding Governor	Karen Rust	governance @brookewestontrust.org	Tina Moring	governance@brookewestontrust.org
	Thomas Clarkson Academy – 01945 585237		The Wisbech Academy – 01945 407909	
Principal	Matt Dobbing	Matt.Dobbing@thomasclarksonacademy.org	Rachel Lawrence	Rachel.Lawrence@brookewestontrust.org
DSL	Alex Salmon	alex.salmon@thomasclarksonacademy.org	Alex Salmon	alex.salmon@thomasclarksonacademy.org
Deputy DSLs	Claire Ziebart Donna Stebbing	claire.ziebart@thomasclarksonacademy.org Donna.Stebbings@thomasclarksonacademy.org	Camilla Carlisle Claire Ziebart Donna Stebbings	Camilla.carlisle@thewisbechacademy.org claire.ziebart@thomasclarksonacademy.org Donna.Stebbings@thomasclarksonacademy.org
DSL Trained Staff	Keri Britton Hayley Davies Kate Allgood Shona Corbett	Keri.britton@thomasclarksonacademy.org Hayley.davies@thomasclarksonacademy.org Kate.allgood@thomasclarksonacademy.org Shona.corbett@thomasclarksonacademy.org	Keri Britton Hayley Davies Kate Allgood Shona Corbett	Keri.britton@thomasclarksonacademy.org Hayley.davies@thomasclarksonacademy.org Kate.allgood@thomasclarksonacademy.org Shona.corbett@thomasclarksonacademy.org
Safeguarding Governor	Jan Hutchinson	governance @brookewestontrust.org	James Down	governance @brookewestontrust.org

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2.	Aim of policy

2.1 The Brooke Weston Trust commits to providing an environment that safeguards and promotes the welfare, safety and health of our students. The BWT recognises the importance of the contribution it can make to protecting and supporting students across its academies.

2.2 The aim of the policy is to:
- Protect children from any maltreatment or harm, whether this is within or outside the home, including online, and provide help and support to meet the needs of children as soon as problems emerge, to prevent any impairment of their mental and physical health and/or development
- To ensure each academy offers a safe and supportive environment for all children under its care and creates a culture of vigilance throughout the organisation
- Ensure all staff, governors and visitors are aware of and clearly understand their statutory safeguarding responsibilities
- Outline how all staff, governors and visitors will meet their safeguarding duty and protect children from harm
- Enable all children, no matter what their background or circumstance, to have optimum life chances beyond the Academy.

2.3 BWT will therefore ensure the following arrangements are in place to safeguard and promote the welfare of children.
- Prevention: BWT will create an ethos and culture where all students feel secure and able to build trusted relationships with staff. Children will be encouraged to talk and feel confident that they will be listened to. Staff and volunteers will be trained regularly to understand their responsibilities to recognise and report safeguarding or child protection concerns. This includes maintaining professional curiosity and understanding that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or may not recognise their experiences as harmful. Students are taught about safeguarding, including online, through various teaching and learning opportunities as part of a broad and balanced curriculum.
- Protection: BWT will ensure that each member of staff, governor and other visitor involved in regulated activity with students has undergone a thorough safer recruitment process and is sufficiently trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns.
- Support: Schools will provide structured systems of support for all students and appoint appropriately qualified and experienced staff (DSLs and DDSLs) to provide advice, training and support around safeguarding concerns.
- Working with parents and external agencies: The BWT will work closely with parents to ensure appropriate communications and actions are undertaken. The BWT will develop and maintain links with relevant external agencies in all matters relating to safeguarding and child protection. All academies assess the risks and issues in the wider community as part of the safeguarding curriculum.
- Commitment: BWT expects everyone to share this commitment, creating a culture of vigilance.

2.4 BWT commits to acting in accordance with Keeping Children Safe in Education. This policy does not aim to replicate the guidance in full. Therefore, the policy should be read in conjunction with at least Part One and Annex B of Keeping Children Safe in Education (2024).

2.5 Whilst the policy primarily focusses on the safeguarding of children, the also references the action to be taken if any member of the Trust community becomes concerned about the safety of welfare of an adult at risk, aged 18 or over (see Section 25).

2.6   **A summary of key information from this policy can be found in Appendix D.**

3.	**Principles this policy is based on**

3.1   BWT recognises that:

- the safety and welfare of a student is always of paramount consideration and will work together with parents, carers and other agencies to safeguard and promote the welfare of the child;
- all children regardless of age, special needs or disability, racial or cultural heritage, religious belief, gender or sexual orientation have the right to be protected from ill treatment and neglect and to experience a good standard of care;
- all children have the right to be heard and that the wishes and feelings of the child should be sought and influence the decision making;
- all incidents and allegations of suspicious or poor practice or abuse will be taken seriously, listened to and responded to appropriately. This includes allegations raised through the whistleblowing procedures;
- there is a consistent understanding of acceptable behaviour of young people towards other young people and staff within the Trust and
- safeguarding is everyone's responsibility.

3.2   BWT expects:

- Everyone to be alert to signs of abuse, neglect and exploitation and follow procedures to ensure that children receive effective support, protection and justice.
- Everyone to know to whom they should report any concerns or suspicions;
- Everyone to be committed to creating a culture of safety that minimises the opportunity for any kind of abuse, neglect or exploitation (including all forms of child-on-child) through training, education and robust response procedures.
- All academies to have procedures (of which all staff and visitors are aware) for handling suspected cases of abuse, neglect or exploitation of students, including procedures to be followed if a member of staff is accused of abuse, or suspected of abuse;
- A Designated Safeguarding Lead (DSL) and any Deputy Safeguarding Leads (DDSLs) to have responsibility for co-ordinating action within the Academy and liaising with other agencies. They must be the most appropriate person to advise on the response to safeguarding concerns.

3.3   BWT commits to work in partnership with the Northamptonshire Safeguarding Children Partnership (NSCP) and the Cambridgeshire and Peterborough Safeguarding Children Partnership and will follow their guidance and implement their systems and protocols for referring families for early help and reporting child protection concerns. The Partnerships will ensure that each academy is aware of issues within the community that are relevant to them. DSLs will ensure that all staff and governors are aware of those issues and systems for reporting and will provide local safeguarding updates, as signposted by the partnership(s). **A summary of the safeguarding issues facing each academy, and the academy's response, can be found in Appendix C.**

3.4   This policy is applicable to all on- and off-site activities undertaken by pupils whilst they are the responsibility of the school.

3.5   The Trust are committed to anti-discriminatory practice and recognise children's diverse circumstances. Some children are at an increased risk of abuse, neglect or exploitation and additional barriers can exist for some children with respect to recognising or disclosing it. We ensure that all children have the same protection, regardless of any barriers they may face.

4.	**Legislation and statutory guidance**

This policy sets out how the Brooke Weston Trust carries out its statutory responsibility to safeguard and promote the welfare of students. This includes:

4.1 Statutory Guidance
- Keeping Children Safe in Education (KCSIE) (2024)
- Working Together to Safeguard Children (2023)
- Multi-agency statutory guidance on female genital mutilation (2020)
- Early Years Foundation Stage (2024)
- Teachers' Standards July (2021)

4.2 Legislation
- The Children Act 1989 and The Children Act (2004)
- Section 5B(11) of the Female Genital Mutilation Act (2003), as inserted by section 74 of the Serious Crime Act (2015)
- The Rehabilitation of Offenders Act (1974)
- Safeguarding Vulnerable Groups Act (2006)
- Counter-Terrorism and Security Act (2015) (and the Prevent Duty Guidance, 2023)
- The Education Act (2002)
- Education (Independent Academy Standards) (England) Regulations (2014)
- The Academy Staffing (England) Regulations (2009)
- Part 1 of the schedule to the Non-Maintained Special Academies (England) Regulations (2015)
- The Equality Act (2010)
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment)
- The Childcare Act (2006)
- Public Sector Equality Duty (2012)
- Care Act (2014)
- Mental Capacity Act (2005)

4.3 The BWT also has regard to the following guidance and reviews relating to safeguarding, including:
- Use of Reasonable Force: Advice for headteachers, staff and governing bodies (2013)
- What to do if you are worried a child is being abused (2015)
- Guidance for safer working practice for those working with children and young people in education settings (2022)
- Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers (May, 2024)
- Teaching Online Safety in schools (2023)
- DfE Guidance on Relationships education, relationships and sex education (RSE) and health education (2019, updated 2021)
- Sharing nudes and semi nudes: Advice for education settings working with children and young people (2024)
- Child Protection in England: National review into the murders of Arthur Labinjo-Hughes and Star Hobson (2022)
- Local Child Safeguarding Practice Review: Child Q (2022)
- Searching, Screening and Confiscation (2022)
- The Prevent Duty: Safeguarding learners vulnerable to radicalisation (2023)

4.4 Guidance
From the North Northamptonshire and Cambridgeshire Safeguarding Children Partnership (NSCP):
http://www.northamptonshirescb.org.uk
https://www.safeguardingcambspeterborough.org.uk/children-board/

5.	Definitions

5.1 **Safeguarding and promoting the welfare of children** is defined in Working Together (2023) as:
- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, wherever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

5.2 For the purposes of this policy, the term **'safeguarding'** refers to everything all academies do to keep children safe and promote their welfare, including (but not limited to):

- Supporting students' health, safety and well-being, including their mental health;
- Meeting the needs of children with special educational needs and/or disabilities;
- The use of reasonable force;
- Meeting the needs of children with medical conditions;
- Providing first aid;
- Educational visits;
- Intimate care and emotional wellbeing;
- Online safety and associated issues;
- Appropriate arrangements to ensure Academy security, taking into account the local context;
- Keeping children safe from risks, harm and exploitation; and
- Child protection.

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

5.4 **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment on others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

5.5 **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Working Together (2023) states that Neglect may involve a parent of 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).
- Ensure access to inappropriate medical care or treatment.
- Provide suitable education.

5.6 **Child on child abuse** refers to the abuse of a child or children perpetrated by another child or children. 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 children;

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting (which is a criminal offence), 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).[1]

5.7 Children includes everyone under the age of 18.

5.8 Within this policy:
- **Parent'** refers to birth parents and other adults in a parenting role, for example adoptive parents, stepparents and foster carers.
- **'Staff'** or **'members of staff'** refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of the Academy.

5.9 Keeping Children Safe in Education (September 2024) may be abbreviated to 'KCSIE'.

5.10 Child abuse is covered by the term **"significant harm"** and is defined in the Adoption and Children Act 2002 in the following way:
- "harm" means ill-treatment or the impairment of health or development
- "development" means physical, intellectual, emotional, social or behavioural development
- "health" means physical or mental health
- "ill-treatment" includes sexual abuse and forms of ill-treatment which are not physical

6.	Who is responsible for carrying out this policy?

6.1 Safeguarding and promoting the welfare of children is **everyone's responsibility** – it is the duty of all staff, trustees, governors, volunteers and visitors at BWT to accept and understand their responsibilities for safeguarding and to follow the agreed principles and procedures outlined in this policy.

6.2 The Board of Directors/Trustees will:
- determine and keep under review the Trust's safeguarding policy;
- ensure that an effective organisation is created for the management of safeguarding and child protection concerns;
- ensure that the Trust promotes the correct attitude towards safeguarding and child protection with staff, volunteers and visitors; and
- monitor and evaluate the effectiveness of the academies' safeguarding practices and procedures.
- Nominate a Safeguarding Trustee to Chair the Safeguarding Review Group and report back to the Board.

6.3 The Chief Executive Officer (CEO)

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[1] Keeping Children Safe in Education (2023)

The CEO, as delegated by the Board of Directors, is accountable for the safeguarding of children across the BWT and responsible for the implementation of this policy across the Trust's academies. The CEO reports to the Board of Directors on all safeguarding matters.

The CEO will:

- ensure that the Trust has suitable safeguarding-related policies implemented in all Trust academies, including the behaviour policy for students and a professional and safe conduct policy for staff.
- regularly review the effectiveness of the safeguarding provision across the Trust, including assessment of progress against the Trust's safeguarding strategy and review of safeguarding risks.
- ensure that this policy is reviewed annually and ratified by the Board.
- respond to low level concerns or allegations of abuse against members of the Executive Team in line with the Low-Level Concerns and Dealing with Allegations Against Staff Policies.

6.4 The Safeguarding Review Group

The Safeguarding Review Group is a subcommittee of the Board. The core purpose of the Safeguarding Review Group is to initiate improvements in the Trust's working practices, systems and procedures to support effective safeguarding practice in each Academy's statutory and regulatory roles to protect young persons from potential or actual harm.

6.5 It is the responsibility of the Safeguarding Review Group to ensure implementation of the Trust's safeguarding policies, monitoring the effectiveness and impact of the policies and recommend and implement improvements where needed. The Safeguarding Review Group will have due regard for Keeping Children Safe in Education (2024), ensuring that policies, procedures and training in all academies are effective and comply with the law.

6.6 The Chair of the Safeguarding Review Group provides a (brief and by exception) written report to each Board meeting to report on risk in this area.

6.7 Local Governing Bodies

It is the overarching responsibility of the local governing bodies to foster a safeguarding culture within their academies, where all stakeholders are actively engaged in promoting a safe environment for children and young people. This involves continuous evaluation, feedback mechanisms, and collaboration with schools to uphold the highest standards of safeguarding practices. By monitoring and supporting the implementation of safeguarding policies, local governance plays a crucial role in safeguarding the welfare of students within their communities.

6.8 The local governing body must appoint a nominated Safeguarding Governor to monitor the safeguarding culture and report back to the Local Governing Body. The Safeguarding Governor will visit the school regularly, following which a written report will be prepared for the local governing body.

6.9 All those involved in governance must attend all relevant induction and annual training and development provided by the Trust. It is the responsibility of all trustees and governors to ensure they have read and understood the KCSIE document (at least Part 1, Part 2 and Annex B) and this policy and have signed a declaration confirming this has been undertaken on appointment and each time the policy and KCSIE are updated. This will be monitored by the Trust Governance Team.

6.10 The local governing body will contribute to the Trust safeguarding governance arrangements, supporting the Trust Central Team and Trustees to meet their governance responsibilities outlined in Keeping Children Safe in Education (2024), including Part 2.

6.11 The Director of Education has strategic responsibility for the standards in Trust academies, including quality of safeguarding provision. It is the responsibility of the Director of Education to:

- ensure that suitable arrangements are in place within each academy to satisfy the duties and arrangement as outlines in this policy, including ensuring that there is appropriate staffing with the required time, funding, resources and support;
- ensure, in co-ordination with the Principal, that all relevant Senior Managers are capable and competent in their given roles and provided with suitable and sufficient information and instruction;
- maintain strategic oversight of the effectiveness of safeguarding within their academies;
- ensure each academy has a nominated Safeguarding Governor
- respond to low level concerns or allegations of abuse against Principals and/or members of the Central Team (excluding the Executive Team) in line with the Low-Level Concerns and Dealing with Allegations Against Staff Policies.

6.12 **Principals/Associate Principals** are accountable for the effective safeguarding of children in their Academy's and will:

- ensure that this policy and associated procedures, including the use of CPOMS, are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of systems that support safeguarding, including this policy, as part of their induction.
- ensure that all staff are made aware of the named governor for safeguarding and the DSL;
- promote an environment and culture of safety where students feel safe and listened to and this includes ensuring that the curriculum includes safeguarding and how to keep safe;
- ensure that the role of 'DSL' is explicit in the role-holder's job description, that they have appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent;
- decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the DSL;
- organise appropriate cover for the role of DSL for any out of hours/out of term activities;
- appoint a 'Designated Teacher for Looked After and Previously Looked After Children' to promote the educational achievement of children looked after and previously looked after;
- ensure the whistle blowing policy and procedures have been disseminated to all staff and that any allegations against staff are responded to appropriately;
- ensure safe recruitment practice is followed when recruiting to posts.
- ensure that all recruitment follows the safer recruitment guidance (see Part 3 of KCSIE) and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse/concerns against all other members of staff and act as the 'case manager' in the event of an allegation of abuse/concerns made against another member of staff or volunteer, implementing the appropriate disciplinary and appeals procedures as required
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the Academy works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;
- safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012);
- ensure that children's social care (from the host local authority or placing authority) have access to the Academy to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2024);
- ensure the relevant staffing ratios are met, where applicable (Early years providers and

primary academies); and

- contribute to safeguarding quality assurance activities; and
- make sure each child in the Early Years Foundation Stage is assigned a key person (Early years providers).
- **Each academy Principal will retain accountability for all safeguarding-related matters within their academy.**

6.13 **Designated Safeguarding Leads (DSL)**

The DSL is a member of the Senior Leadership Team. The DSL takes lead responsibility for child protection and wider safeguarding. This includes online safety and an understanding of the filtering and monitoring systems in place). DSLs will be given additional time, funding, training, resources and support to carry out their role effectively. Each Academy's DSL is listed on p. 6-7. The full responsibilities of the DSL are set out in Annex C, KCSIE (2024).

Note: The Trust Head of Safeguarding is not the DSL for any individual academies within the Trust.

6.14 When the DSL is absent, the Deputy DSL will cover. If they are not available, a member of SLT will cover. Any deputies will be trained to the same standard as the designated safeguarding lead. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

6.15 BWT recognises the pressures inherent within the role of DSLs and DDSLs, and the demands placed upon them. To preserve staff wellbeing, BWT does not expect DSLs or DDSLs to monitor emails, phonelines or CPOMS (child protection recording software) outside of working hours, except during periods of planned academy trips or activities. All members of the academy community (staff, parents, and students) will be made aware of this expectation. Where staff are not contracted to work outside of termtime, an emergency rota will be in place covering normal working hours during holiday periods, but excluding bank holidays and weekends. To promote the safety of children during these times, academies will regularly share contact details for statutory and non-statutory support services, including police and children social care, with all members of the academy community. This will include via the academy website.

6.16 The DSL will:

- act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- provide oversight, support and challenge to DDSLs;
- act as a point of contact with the safeguarding partners and engaging fully with requests for information (e.g., Section 175 audit);
- perform the role of Online Safety Lead;
- be aware of and up to date with latest national and local guidance and requirements, ensuring this is shared with all key personnel.
- advise on the response to safeguarding concerns, ensuring that all safeguarding concerns raised by staff are properly assessed, categorised, actioned and resolved, and ensuring that decisions and rationales are clearly recorded;
- liaise with the Local Authority and work with other agencies in line with 'Working Together to Safeguard Children (2023);
- be aware of the requirement for children to have an Appropriate Adult and follow the procedures outlined in Appendix A;
- identify if children may benefit from early help;
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- make referrals to the Channel programme where there is a radicalisation concern and/or

support staff that make a referral to Channel;

- support their academy with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- refer cases to the police where a crime may have been committed;
- be available during academy hours for staff to discuss any safeguarding concerns. In the event that they are not available, a deputy will be made available;
- undertake training to equip them with the skills to carry out the role and update this every two years;
- maintain a forensic understanding of safeguarding data, including data relating to child-on-child abuse;
- ensure all staff that work directly with children have read and understood Part 1 and Annex B of KCSIE (September 2024);
- ensure all staff that do not work directly with children have read either Part 1 or Annex A (as appropriate) of KCSIE (2024);
- update their knowledge and skills regularly and keep up with any developments relevant to their role;
- provide staff in their academy with the knowledge, skills and support required to safeguard children;
- ensure that all staff in their academy receive initial training and appropriate regular update training via whole staff training or bulletins on safeguarding, including how to recognise the signs and symptoms of abuse, neglect and exploitation. This includes provision of training on how to report a safeguarding concern through the academy's CPOMS safeguarding recording system.
- ensure that all staff have an understanding of child abuse, neglect and exploitation and their main indicators, including for looked after children and additional vulnerabilities of children with special educational needs and disabilities or those who identify as LGBTQ+
- take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- take responsibility for the transfer of safeguarding files when a child leaves their academy;
- monitor academy mobility, and in particular take responsibility for those children removed from the academy is in adherence with LA and Trust guidance, ensuring that all reasonable steps are taken to ensure that the child is safe;
- attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- ensure that parents and carers are informed of the safeguarding procedures by a statement in the academy prospectus, access to the policy and procedures on the academy website and reminders via newsletters;
- work closely with other relevant education professionals (e.g., SENCO, Virtual Academy Head) to ensure children with additional vulnerabilities are safeguarded;
- help to promote educational outcomes of children who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the academy leadership team;
- promote a 'culture of safeguarding', in which every member of the academy community acts in the best interests of the child;
- meet regularly with the safeguarding link governor and/or Chair of Governors to review safeguarding at their academy;
- meet regularly with relevant curriculum leads to share information about emerging trends and ensure that the safeguarding curriculum is meeting the needs of students;
- meet regularly with the academy Business Manager/HR to ensure that safe recruitment practices are in place and effective, including checking that the academy's Single Central

Record is maintained in line with statutory guidance;
- contribute to safeguarding quality assurance activities;
- Liaise with the headteacher regarding safeguarding cases and issues.

6.17 All staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. All staff:

- have a responsibility to provide a safe environment, where children can learn;
- will be made aware of and should be clear on the Trust and individual academy's policy and procedures with regards to safeguarding and child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- will complete mandatory training provided by the Trust/academy so that they know and understand: how to identify indicators of abuse, neglect, exploitation and harm and the behaviours associated with these risks; what to do if a child discloses information which is a safeguarding concern (including FGM); what safeguarding systems are in place within the academy, including the use of CPOMS for recording concerns, decisions and actions, and;
- must be aware of who the safeguarding team are
- are responsible for ensuring that they have read and understood key policies such as the Acceptable Use Policy, Professional and Safe Conduct Policy and the Safeguarding and Child Protection Policy. Staff must also regularly familiarise themselves with the key information contained with Appendix D of this policy.
- should be prepared to make referrals to the MASH if they are concerned that a child is suffering, or likely to suffer, significant harm and understand the role that they may be expected to play in social care assessments;
- will be encouraged to contribute to the development of safeguarding policy and practice.

6.18 All staff that work directly with children will be provided with a copy of, and must read, Part 1 and Annex B of KCSIE annually and will receive annually updated training on their safeguarding roles and responsibilities. Staff that do not work directly with children will be provided with a copy of Part 1 of KCSIE (2024) and must read this document. In either case, all members of staff must sign a declaration confirming they have done this. Academies will make use a variety of methods to assess staff understanding.

6.19 Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of Trust or individual academy safeguarding policy or practice, they speak to the DSL or Head of Safeguarding immediately, so that additional training can be arranged.

6.20 **The Head of Safeguarding** will set the strategic safeguarding direction for the Trust, working in an advisory capacity to provide support and guidance to Principals and DSLs on all safeguarding related matters. The main areas of responsibility include:

- Strategic oversight of developing safeguarding and child protection ensuring statutory compliance and development of this area
- Developing, implementing, and evaluating the impact of an annual safeguarding action plan
- Representing the Trust within strategic multi-agency partnerships
- Implementing of the Safeguarding Learning and Improvement Framework to promote effective quality assurance and practice improvement
- Implementing the Safeguarding Learning and Development Strategy to support academies to identify and respond to statutory and emerging training needs
- Providing or facilitating the provision of advice, guidance and coaching support to DSLs on complex safeguarding cases
- Chairing Trust DSL Network Meetings

6.21 **The Trust Safeguarding Advisor** will provide operational safeguarding advice, support and guidance to leaders across the Trust, including structured supervision, deputising for the Head of Safeguarding. The main areas of responsibility include:
- Providing safeguarding supervision to DSLs and core Deputy DSLs
- Conducting regular audits of child protection records, identifying emerging themes and areas for development, and incorporating these in to learning and development activities
- Conducting a range of quality assurance activities relating to safeguarding, alternative provision, elective home education and children missing from education
- Supporting with the implementation of Trust-wide strategies relating to safeguarding and mental health.
- Membership of the Strategic Safeguarding Group.
- Membership of the Safeguarding Review Group.

6.22 **The Primary and Secondary Phase Safeguarding Advisors** will work in an advisory capacity across the Trust, providing support and guidance to the Head of Safeguarding and DSLs across their respective phase. The main areas of responsibility include:
- Chairing respective Primary and Secondary DSL Network Meetings, incorporating group case supervision
- Supporting the implementation of exemplary safeguarding practice across each phase, as informed by BWT policies
- Contributing to the development and implementation of the Primary and Secondary Safeguarding Action Plan, as informed by the Trust Safeguarding Action Plan, and lead on oversight and evaluation
- Contributing to the development and delivery of Trust-wide safeguarding learning and development opportunities, as informed by the Trust Learning and Development Strategy
- Contributing to the development and evaluation of the Trust Safeguarding and Child Protection Policy
- Membership of the Strategic Safeguarding Group
- Membership of the Safeguarding Review Group
- Providing a virtual source of advice and support to DSLs, if required

Student Safeguarding

7. Recognising and responding to abuse, neglect and exploitation: how to take action

7.1 If a member of staff, parent or member of the public is concerned about the safety or welfare of a child, they should report it to the DSL as soon as possible. If the DSL is not available, it should be reported to the deputy safeguarding lead/s immediately. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.

7.2 Although any member of staff can make a referral to children's social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out below in the event of a safeguarding issue.

7.3 All staff will be alert to indicators of abuse, neglect and exploitation (including child on child) and will report any of the following to the Designated Safeguarding Lead immediately;
- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- any concerning behaviours exhibited by children that may indicated that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
- any significant changes in attendance or punctuality;

- any significant changes in a child's presentation;
- any indicators that a child may be experiencing child on child abuse;
- any concerns relating to people who may pose a risk of harm to a child; and/or
- any disclosures of abuse, neglect or exploitation that children have made.

7.4   More information about our approach to child on child abuse (including sexual violence and sexual harassment) can be found in sections 11.3 and 12.

7.5   For more information regarding specific safeguarding issues, please see Part One and Annex B of KCSIE (2024) and Section 11 of this policy.

7.6   **Responding to a Disclosure**
When responding to a disclosure from a child, staff will:
- listen to what is being said without displaying shock, disbelief or other emotion;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, but not make promises which might not be possible to keep;
- never promise a child that they will not tell anyone – it may not be in their best interest;
- reassure them that what has happened is not their fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify – do not investigate;
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- not ask students to write a written record of their disclosure;
- reassure the victim they are being taken seriously and they will be supported and kept safe. A victim should never be given the impression they are creating a problem by reporting abuse, neglect or exploitation (including sexual violence and sexual harassment), nor should a victim ever be made to feel ashamed for making a report;

7.7   **Reporting and Recording a Concern**
All staff and volunteers receive guidance on the procedures to report safeguarding concerns upon induction and receive regular updates. All concerns should be reported in writing, using CPOMS. Records should be created as soon as possible, on the same day and during working hours. Staff should never wait until the next day to complete a safeguarding concern report. All staff and volunteers will:
- make a written record (see Record Keeping), informing the child that you are doing so;
- pass the information to the DSL and DDSL without delay, either in person (for immediate, priority cases) or through the use of CPOMS (lower-level concerns) depending on the nature of the concern. All reports to the DSL must be followed up in writing through CPOMS.

The DSL/DDSL will then:
- keep a confidential record of all comments, actions and observations. These records will be filed, kept securely and access will restricted to only staff authorised by the DSL, Principal or Trust Head of Safeguarding.
- seek to discuss any concerns about a student with their parents. This must be handled sensitively and the DSL or the DDSL will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the DSL or the DDSL believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care/Multi Agency Safeguarding Hub (MASH).
- If the DSL or the DDSL believes that "a child is experiencing or may have already experienced abuse or neglect" or "is at risk of suffering significant harm" either now or in the future, then the academy will comply with the procedures of the Local Safeguarding Partnership.

7.8   **Concerns About Significant Harm or Imminent Danger**

Any member of staff that suspects or has evidence of child abuse, or is concerned that a child may be at risk of imminent danger, they must notify the DSL or a DDSL **immediately and in person.** A referral must be made if a child may be suffering or at risk of suffering harm. Whilst the DSL or a DDSL should make the referral, anyone can make a referral to children's social care. If anyone other than the DSL makes a referral to children's social care or to the police, they should inform the DSL as soon as possible.

7.9 Concerns Below the Threshold for Significant Harm and No Imminent Danger

Staff should log concerns on CPOMS, at the earliest opportunity, providing sufficient information and context for the DSL/DDSL to assess the information. The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the thresholds guidance published by the local safeguarding partnership. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence. See Section 19 for more details.

All concerns, discussions and decisions will be recorded in writing.

The DSL will provide guidance on the appropriate action. Options will include:
- managing any support for the child internally via the academy's own pastoral support processes;
- an Early Help Assessment; or
- a referral for statutory services where the child is or might be in need, or suffering or likely to suffer significant harm.

7.10 Early help and Vulnerable Children

All staff should be prepared to identify children who may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes, or reduces the chance of a problem getting worse. It means providing support as soon as a problem emerges at any point in a child's life. If early help is appropriate, the DSL or DDSL will generally lead on involving the child and family and liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

All staff will be made aware of the early help process, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL or DDSL any ongoing/escalating concerns so that consideration can be given to a referral to children's social care if the child's situation does not appear to be improving.

We recognise that any child can be the victim of abuse, harm or exploitation and may benefit from early help. However, we will be particularly vigilant to potential need for early help if a child;
- 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 (EHCP));
- has a mental health need;
- is a young carer;
- is bereaved;

- 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 of a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised;
- is viewing problematic and/or inappropriate online content, or developing inappropriate relationships online;
- 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 and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- is suffering from mental ill health;
- has returned home to their family from care;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is missing education, or persistently absent from school, or not in receipt of full-time education;
- has experienced multiple suspensions and is at risk of, or has been permanently excluded.

The DSL will maintain a list of students who the academy has identified to be at potential risk, including those with a social worker, and ensure that relevant staff are aware and that these students are monitored closely and supported to achieve the best possible outcomes. Many of these children will be looked after children, or previously looked after children, or have special educational needs or disabilities.

7.11 Referrals

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible. Children's social care assessments should consider where children are being harmed in contexts outside the home, so the Academy will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The academy will be guided by MASH as to the appropriate outcome e.g., complete an Early Help Assessment (EHA) or refer to a relevant specialist agency.

All Child Protection records, including referrals, will be maintained in a confidential file at the academy. The protocols as outlined in the Data Protection Policy must be followed.

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

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

The DSL should refer all cases of suspected abuse, neglect or exploitation to the Multi Agency Safeguarding Hub (MASH), police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Consent will be required before support can be delivered to any individual through the Channel programme. Contact details for the MASH can be found in Section 1 of this policy.

7.12 Trigger Points and Escalation

In the event of serious incidents, Principals, Executive Principals and the Head of Safeguarding should be notified by the DSL/Principal in line with the Serious Incident Escalation Process (see BWT CPOMS Toolkit). The Chair of the Board and Safeguarding Trustee will also be informed.

8.	Response to Specific Safeguarding Issues

The below provides an overview of how academies will respond to specific safeguarding issues. The list is not exhaustive and is designed to complement the contents of Keeping Children Safe in Education (2024). Staff should follow the procedures outlined above when responding to, recording and reporting the specific safeguarding issues detailed below. The response of DSLs and DDSLs will always be guided by Keeping Children Safe in Education (2024) and multi-agency policies and procedures implemented by the safeguarding partnership.

8.1 Female Genital Mutilation

FGM is a collective term for all procedures involving the partial or total removal of external female genitalia for cultural or other nontherapeutic reasons.

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), the Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015) places a statutory duty upon teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Further information can be found here, and within Appendix B.

8.2 Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. A marriage must be entered into with the free and full consent of both parties, there must be a choice. Forced marriage is a crime.

Since 2023, it has also been a crime for a person 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.

When responding to concerns regarding Forced Marriage, advice can be sought from the Forced Marriage Unit:

- Telephone - (0) 20 7008 0151
- Email - fmu@fcdo.gov.uk
- Multi-Agency statutory guidance for dealing with forced marriage can be found here.

Further information can be found here.

8.3 Breast Ironing/Flattening

Breast ironing or flattening is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing

further. In the vast majority of known cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware.

Breast ironing is a form of physical abuse.

Staff or volunteers worried about the risk of breast ironing should report their concerns to the DSL immediately, who will make a referral to the Multi-Agency Safeguarding Hub. If staff or volunteers are concerned that a student is in immediate danger, they should contact the police immediately by calling 999.

The DSL will contact the Foreign and Commonwealth Office if the student has been taken abroad:
- Telephone – 020 7008 1500
- Further information can be found here.

8.4 Radicalisation and Extremism

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be part of each academy's safeguarding approach.

Keeping Children Safe in Education (2024) provides the following definitions of extremism, radicalisation and terrorism:

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 forced.

Radicalisation is the process of a person legitimising support for, or the use of, terrorist violence.

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.

However, a new Government definition of extremism was published on 14 March 2024:

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 or democratic rights; or
- Intentionally create a permission environment for others to achieve the results in either of the above.

Examples of behaviours that could constitute extremism can be found here.

The Brooke Weston Trust has a statutory duty under Section 26 of The Counter-Terrorism and Security Act 2015 and the statutory Prevent Guidance 2023 to have "due regard to the need to prevent people from becoming terrorisms or supporting terrorism".

The Prevent Duty Guidance sets out the expectations, requirements and recommendations for activity within the education sector. These are grouped into the following themes:

- Leadership and Partnership
  - **Leadership** – Each academic will identify a Prevent Lead who is responsible for overseeing Prevent delivery. This includes ensuring that all staff understand the risk of radicalisation through effective training, building and promoting capability to deal with radicalisation concerns by understanding Prevent referral processes, and promoting the importance of Prevent and the role staff play in countering terrorism.
  - **Partnership Working** – Academies will work with Prevent Leads within partner agencies, engage with multi-agency forums, where available, engage in the Prevent referral process and co-operate with Channel panels, where practicable. Academies will follow policies and procedures defined by the local Safeguarding Partnership.
- Capabilities
  - **Understanding Risk –** Each academy will contribute to, engage with, and use the Counter Terrorism Local Profile to understand and respond to the risk of radicalisation. This will include ensuring and recording that all staff have completed Prevent training, at levels relevant to their roles.
  - **Managing Risk –** Each academy will maintain a Prevent Risk Assessment, drawing upon information from the school, Counter Terrorism Local Profile, and national threats. Concerns relating to Prevent will be dealt with in line with the Safeguarding and Child Protection Policy and DSLs will use the National Referral Form when making referrals. Academies will be guided by the DfE guidance Managing Risk of Radicalisation in Your Education Setting.
  - **Sharing Information –** Academies may need to share information about people to ensure that a person at risk of radicalisation is given appropriate support. Each academy will ensure that information is shared lawfully, and in line with legislation relating to data protection and GDPR. When seeking to share personal data regarding people susceptible to radicalisation, staff will consider whether it is appropriate to rely on the person's consent. Where it is not possible to rely on consent, it is still possible to share information if there is a lawful basis for doing so.
- Reducing Permissive Environments
  - Each academy will take steps to limit the potential harm and influence of whose who may seek to radicalise others. These include applying Trust policies and procedures relating to Safer Recruitment, Acceptable Use of Technologies, Online Safety (including filtering and monitoring), Professional and Safe Conduct, and Safeguarding and Child protection. The Trust, and each academy within it, will also take steps to ensure that all providers renting or hiring academy facilities have appropriate arrangements in place to keep children safe (see Section 22).

BWT is also committed to ensuring that all students benefit from a broad and balanced curriculum that prepares them for life in modern Britain. Fundamental British Values underpin all aspects of the education and curriculum offered to students.

More information on the Channel and Multi-Agency Panel (PMAP) process can be found here.

8.5 Child on Child Abuse

All staff should be aware that children can abuse other children (see Section 5.6 for definition and types), either inside or outside of the academy and respond to any concerns with the same rigour as they would for those involving adults. BWT does not accept and will not tolerate child on child abuse of any kind.

Measures to minimise these risks are included in the Anti-bullying and Behaviour and Discipline policies, which should be applied in conjunction with the Safeguarding and Child Protection policy.

8.6 Online Safety

Online safety is an integral part of safeguarding and requires a whole school, cross-curricular approach and collaboration between key school leads. This includes meeting the DfE's Filtering and Monitoring and Digital and Technology Standards, including cyber security. Accordingly, the Online Safety Policy and associated Acceptable Use Policies are written in line with these standards, in addition to KCSIE (September 2023) 'Teaching Online Safety in Schools' 2019, statutory RSHE guidance 2019 and other relevant statutory and non-statutory guidance.

Technology, and the risk and harms associated with it, evolves and change rapidly. The academy will carry out an annual review of their approach to online safety, overseen by the DSL who performs the role of Online Safety Lead.

The Online Safety Lead will work with relevant curriculum leads to ensure that online safety is embedded within the curriculum. This will include ensuring that the curriculum is inclusive and accessible and reflects the heightened vulnerability of some students online (e.g., students with SEND).

Each academy makes use of filtering and monitoring to block inappropriate content and monitor student internet on school-owned devices, or any other student device accessing the school network. Monitoring includes an element of external, human moderation. Concerns are logged directly on to CPOMS and brought to the attention of the DSL. Monitoring does not apply when students access the internet via their own devices and via 3G, 4G and 5G. The academy will teach students about the acceptable use of technology, recognising online risk and ways to stay safe online, including when using personal devices. The academy will encourage students to report any incidents relating to harmful content, conduct or contact. Where such incidents are caused by the behaviour of another student, the Behaviour and Discipline Policy will be applied. Policies in relation to the use of mobile phones by students will be in place within each academy.

Brooke Weston Trust will take all reasonable action to limit children's exposure to online risks from when accessing the IT system. This includes ensuring that all academies have appropriate filtering and monitoring systems in place and ensuring that their effectiveness is reviewed regularly. This will include considering the number and age range of children, those who are potentially at greater risk of harm and how often they access the IT, along with the proportionality of costs versus safeguarding risks. The appropriateness of filtering and monitoring systems are a matter for individual academies and will be informed, in part, by the academy's risk assessment.

Where a safeguarding concern for a student relates to online safety, usual safeguarding procedures in relation to responding, recording and reporting will apply. This may lead to the provision of school-based interventions, early help, or referral to the police or MASH. The response will be overseen by the DSL. More detailed guidance can be found in the Online Safety Policy.

8.7 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. It may involve an 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.

The academy recognises that both boys and girls can be victims of criminal exploitation, and that as children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised. The academy will adopt a child-centred approach when responding to any concerns relating to child criminal exploitation and will always consider child criminal exploitation when responding to reports of suspected offending by students.

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.

Each academy will raise awareness of CSE and CCE when appropriate through the safeguarding curriculum (see Section 12), guided by the age and stage of children and safeguarding priorities within the local area.

Academies recognise that some children may not realise they are being exploited and may believe that they are in a genuine, romantic relationship. The academy will be particularly mindful of this when responding to reports involving 16- and 17-year-olds who, whilst above the legal age of consent, may have been coerced into engaging in sexual activity.

Academies will follow procedures outlined by their local Safeguarding Partnership when responding to concerns about child exploitation. This will include making use of available screening tools to identify and respond to potential risks.

Further information in relation to on Child Sexual Exploitation, Serious Youth Violence, County Lines and Multi-agency Practice Principles for responding to child exploitation and extra-familial harm can be accessed by clicking on the hyperlinks.

8.8 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be 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). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Domestic abuse can also include child/adolescent to parent violence. More information on this hidden form of domestic abuse can be found here.

Students will be encouraged to report incidents of domestic abuse, by raising awareness of healthy relationships through the curriculum and regularly reminding students of sources of help and support available. Staff will also be mindful that the behavioural response of children who witness domestic abuse may include acting out, withdrawal or anxiousness to please. They may exhibit signs of anxiety, or may use violence, aggression, or self-injury to express themselves.

Any concerns relating to domestic abuse will be logged on CPOMS immediately.

Academies will engage with Operation Encompass, a scheme run the police, through which school are notified of incidents of domestic abuse. Upon receipt of this information, DSLs will ensure that students are closely monitored, and support is put in place, where appropriate.

8.9 Mental Health

All staff should be 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.

Whilst only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, staff are well placed to observe children 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, neglect or exploitation, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff should be aware of how these experiences can impact on their mental health, behaviour, attendance and progress at school.

All academies will seek to embed positive mental health and mental health awareness by creating a culture where students can self-identify, signpost peers and seek support themselves. Key staff will complete mental health training and academies will promote positive mental health and wellbeing through the curriculum.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken in line with the procedures outlined above.

Further information on promoting the mental health and wellbeing of children can be found here.

8.10 Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents or cousins.
Academy staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their legal duty to inform the local authority. The Academy itself has a duty to inform the local authority of the private fostering arrangements.

On admission to an academy, steps will be taken to verify the relationship of the adults to the child who is being registered.

8.11 Children Not Collected From School

On rare occasions, instances occur where children of school age are left uncollected for considerable lengths of time. BWT will respond sensitively, yet consistently, to ensure the safety and welfare of all children.

On admission to a school, parents/carers should provide accurate information about who holds parental responsibility for their children i.e. names, addresses and telephone numbers, names and telephone numbers of 2/3 emergency contact persons and any information if anyone other than the parent/carer is to collect a child from school. Parents/carers must provide updated contact details when these are changed.

Schools will ensure that parents are provided with information about the times of the school day and the expectation regarding the delivery and collection of children, where appropriate.

If a child is not collected from school 15 minutes after the end of the school day, staff will telephone (if possible) the parents/carers.

If there is no response, staff will attempt to contact those persons identified as emergency contacts and notify the Principal/DSL.

If, after 30 minutes, it has not been possible to contact parents/carers or emergency contacts, consideration should be given to notifying the police. The Principal/DSL may also contact the Multi-Agency Safeguarding Hub (MASH) team or equivalent, if appropriate.

Detailed, timed records of the action taken, and calls made must be maintained.

9.	**Child on Child Sexual Violence, Sexual Harassment and Sexualised Behaviour**

9.1 As outlined in Sections 5 and 8, the academy recognises that children can abuse children. This may involve harmful sexual behaviour, including sexual harassment and sexual violence.

9.2 Sexualised Behaviour
Children's sexual behaviour exists on a wide continuum (see Hackett Harmful Sexual Behaviour Continuum), ranging from normal and developmentally expected to inappropriate and problematic (problematic sexual behaviour) or abusive and violent (harmful sexual behaviour). Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. It can occur online and/or face-to-face and can also occur simultaneously between the two.

Sexual violence and sexual harassment are examples of harmful sexual behaviour and can occur between two or more children of any age and sex and may occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

All academies adopt a zero-tolerance approach to sexual violence and sexual harassment. Staff will not dismiss incidents as "banter", "just having a laugh" or "part of growing up", as this could lead to a culture of unacceptable behaviour, and unsafe environment, or a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. Staff are expected to challenge and report all forms of sexual violence and sexual harassment.

All staff must adopt an attitude of "it could happen here" and understand that even if there are no reports in their academy, this does not mean it is not happening and may indicate that incidents are not being reported.

All staff will receive training on harmful sexual behaviour, including sexual violence and sexual harassment.

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

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

penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents (this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

9.4 Sexual Harassment

Sexual harassment may include:

- Sexual comments
- Sexual "jokes" or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes
- Displaying pictures, photos or drawings of a sexual nature
- Upskirting (see 5.6)
- Online sexual harassment, which may include:
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos (see BWT CPOMS Toolkit and Online Safety Policy for more information)
  - Sharing unwanted explicit content
  - Sexualised online bullying
  - Unwanted sexual comments and messages, including, on social media
  - Sexual exploitation; coercion and threats, and
  - Coercing others in to sharing images of themselves of performing acts they're not comfortable with online

9.5 Consent

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

- The legal age of consent is 16, so long as both parties have the choice, freedom, and capacity to consent.
- Many young people will develop a healthy and developmentally appropriate interest in sexual relationships whilst they are still children and some will do this before they reach the age of consent (Northamptonshire Safeguarding Children Partnership Inter-Agency Procedures, 2024).
- However, the law states that a child under-13 does not, under any circumstances, have the legal capacity to consent to any form of sexual activity (Section 5 Sexual Offences Act 2003). Therefore, any sexual activity involving under-13s must be reported to police and social care.
- Any sexual intercourse without consent is a sexual offence.
- Children will be taught about consent through the safeguarding curriculum.
- All staff are expected to understand the meaning of consent.

9.6 Preventing Harmful Sexual Behaviour

The academy will adopt a whole school approach to safeguarding, creating a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment. All students will receive a strong preventative education programme that will help to create an environment in which all children are supportive and respectful of their peers when reports of sexual violence and sexual harassment are made.

The DSL will work with local partner agencies, including police and social care, to ensure that they have a proactive understanding of local protocols for harmful sexual behaviour.

The DSL and DDSLs will map out, and know how to access, local specialist support that is available to children who are victims or those displaying harmful sexual behaviour.

The DSL will regularly analyse reports of harmful sexual behaviour, to identify and respond to emerging trends at the student or cohort level. This may involve working with relevant curriculum leads to respond proactively to emerging themes.

The DSL will make use of a range of quantitative and qualitative student voice information to understand the lived realities of students within each academy.

9.7 Initial Response to Reports of Sexualised Behaviour

All incidents of sexualised behaviour should be reported and recorded in line with any safeguarding concern for a child, for which all staff are trained.

When responding to a report of harmful sexual behaviour, staff will:
- Aim to have two members of staff present, including a DSL or DDSL, where behaviours are problematic, or harmful (violent or abusive).
- Reassure victims that they will be taken seriously, irrespective of whether the abuse has occurred inside or outside of school.
- Not promise confidentiality
- Recognise that the initial disclosure ay only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- Consider that certain children may face additional barriers to reporting
- Listen carefully to the child, reflect back, using the child's language, be non-judgemental, be clear about boundaries and how the report will be progress and, not ask leading questions
- Record the incident on CPOMS and notify the DSL or a DDSL. Records Should include the facts as the child presents them and free from opinion.
- Have due regard for the Screening Searching and Confiscation Guidance, and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people, when responding to incidents involving online sexual abuse.

All DSLs and DDSLs will understand local referral processes to police and social care.

9.8 DSL or DDSL Response to Harmful Sexual Behaviour

When responding to a report of harmful sexual behaviour, DSLs and DDSLs will:
- Take immediate action to safeguarding and protect the victim, child displaying harmful sexual behaviour and any other children or staff who may be at risk
- Triage the incident using the Brook Traffic Light Tool (trained staff only), guided by the Hackett Continuum of Harmful Sexual Behaviour
- Inform the victim's parents or carers (unless doing so would place the victim at risk)
- Inform the parents of the child who is alleged to have displayed harmful sexual behaviour (in consultation with police, if necessary)

- Consider whether the report will be managed internally, via early help (e.g., for non-violence cases of harmful sexual behaviour), via referral to children social care or to police, ensuring that the response is proportionate
- Make a referral to children's social care if a child has suffered, or is at risk of suffering, significant harm or imminent danger
- Report incidents of rape, sexual assault by penetration and sexual assault to the police
- Balance the victim's wishes against their duty to protect the victim and other children
- Offer appropriate specialist support for the victim and the child displaying harmful sexual behaviour
- Do all they reasonably can to protect the anonymity and ongoing safety of all children involved
- Complete a risk and needs assessment for all cases of sexual violence, taking in to account all victims, all children displaying harmful sexual behaviour, the time and location of the incident and any action required to make the location safer. Risk assessments will be recorded, kept under review at all times and shared with staff on a need-to-know basis in order to keep children safe

In addition to the above, DSLs will consider and record the incident on CPOMS, using the BWT Harmful Sexual Behaviour Reporting Template. This DSL will maintain an understanding of intra familial harms and any necessary support for siblings following incidents.

DSLs and DDSLs will use the above to form the rationale for any decisions made. Decisions and rationales will be recorded on CPOMS.

Where a DSL/DDSL makes a referral to police or social care against the victim's wishes, this will be handled carefully and sensitively, with adequate time given to explaining the decision and rationale to the victim.

In cases which are found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who has made the allegation is in need of help and/or may have been abused by someone else. Where this is the case, consideration will be given to referring to children's social care.

In cases which are shown to be deliberately invented or malicious, the academy will consider taking disciplinary action in line with the Behaviour and Discipline Policy.

9.9 Managing Police Involvement in Case of Harmful Sexual Behaviour

When a report has been made to police, the DSL will:

- Consult with police and agree what information can be disclosed to staff and others, including the parents of the child who is alleged to have displayed harmful sexual behaviour, and how to protect the victim and their anonymity.
- Work closely with the police to ensure that any actions taken by school do not jeopardise the police investigation, but will not wait for an outcome before taking steps to protect all children involved and in the wider academy community
- Carefully consider the balance between managing risk and the rights of an unconvicted person, particularly when the police make use of bail conditions
- Continue to offer support to the child who has allegedly displayed harmful sexual behaviour
- Update the risk assessment in cases where the police find a child guilty of an offence, to ensure relevant protections are in place, and consider any suitable action in line with the Behaviour and Discipline Policy.
- Continue to support all children involved for as long as is necessary in cases where the police outcome is "no further action".

Disciplinary action can be taken by the academy whilst other investigations by children's social care or police are ongoing. The academy will seek to form a conclusion, on the balance of probabilities, about what happened and impose a penalty accordingly. The academy will work with partner agencies to avoid prejudicing an investigation and/or subsequent prosecution by the action taken.

9.10 Ongoing Management and Support for Children

When safeguarding and supporting the victim, the DSL will:

- Empower the victim to retain as much control of the process as possible
- Enable the victim, if they wish, to continue their normal routine
- Explore and offer a range of internal and external specialist support, if required
- Ensure that staff are sensitive to the potential needs of the victim
- Avoid taking action to isolate the victim, in particularly from supportive peer groups, but work with victims to consider adaptations to the school timetable if this is in line with their wishes
- Provide all necessary support to the victim to remain in the academy, but support the wishes of the victim and their family if their preference is to consider alternative provision or alternative schools

When safeguarding and supporting the child who has allegedly displayed harmful sexual behaviour, the DSL will:

- Seek to identify and respond to any unmet needs
- Consider and manage any risks posed to other children
- Support the child to prevent re-offending and address ay underlying trauma that may be causing their behaviour
- Implement a comprehensive safeguarding management plan to support the child to have continued access to education. This may involve working with other schools or providers of alternative provision.

9.11 Monitoring Harmful Sexual Behaviour

The DSL will conduct regular reviews of all incidents of harmful sexual behaviour, to ensure that incidents have been recorded and responded to correctly, and that all children have received appropriate support.

10.	Children at Greater Risk of Harm

10.1 Brooke Weston Trust recognises that whilst all children should be protected, some groups of children are potentially at greater risk of harm than others (both on and offline). All staff will be made aware of the potentially heightened vulnerability of the following student groups. Key staff will be made aware of potentially vulnerable students, on a need-to-know basis. DSLs will put in place mechanisms facilitate additional monitoring of students identified as vulnerable. This may include implementing additional school-level interventions, working with partner agencies to provide early help, or referring to statutory or specialist services, if required.

10.2 Special Educational Needs and Disabilities

The Trust fully recognises the importance of awareness around additional vulnerabilities of children with special educational needs (SEN) and disabilities, or certain medical or physical health conditions and the additional safeguarding challenges children can face both on and offline. All staff will be made aware of the additional barriers that can exist when recognising abuse, neglect and exploitation in this group, including:

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

and difficulties in overcoming these barriers; and/or

- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviors in or the consequences of doing so.

The DSL will liaise closely with the SENCO following any reports of abuse relating to children with SEND and consider extra pastoral support. Further information can be found in the BWT SEND Policy.

10. 3   Children who are lesbian, gay, bisexual, or gender questioning

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

The Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

In line with recommendations within KCSIE, when families/carers are making decisions about support for gender questioning children, they will be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

When supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving the parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to the DfE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

10.4   Children with a social worker and those who previously needed a social worker

Students may need a social worker due to safeguarding or welfare needs. This may be due to abuse and/or neglect and/or exploitation and/or complex family circumstances. The Trust recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and positive mental health.

Academies will work with the local authority and external agencies to ensure there is effective support for this group of children.

Local authorities should share the fact that a child has a social worker, and the DSL will hold and use this information to ensure that decisions can be made in the best interest of the child's safety, welfare and educational outcomes. This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support), and will be taken into account when making decisions which may increase the level of risk to a child (e.g., fixed term or permanent exclusions). In such circumstances, academies will work with partner agencies to identify and mitigate risks, wherever possible.

10.5 **Looked after children and previously looked after children**

All staff must be aware of the issues regarding safeguarding for looked after and previously looked after children.

All academies will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, they will ensure that:

- appropriate staff have relevant information about a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements;
- the DSL has details of social workers and relevant virtual school heads;
- each Academy has a Designated Teacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance, including children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales;
- the designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to; and
- work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

10.6 **Elective Home Education (EHE)**

Whilst the Trust recognises that many home educated children have an overwhelmingly positive learning experience, this is not the case for all. This can mean some children are not in receipt of suitable education and are less visible to services that are there to keep them safe and supported in line with their needs.

All staff will encourage parents to send their children to school to embrace the benefits of being a part of the Trust community, particularly those who are vulnerable. Under no circumstances will any academy attempt to pressure or encourage a parent to home educate.

Where an application for EHE is made, the academy will seek to meet with parents to determine whether the decision to home educate is in the best interests of the child. A summary of this meeting will be recorded on CPOMS.

The academy will also look to engage the Local Authority and other relevant agencies at the earliest opportunity to ensure that parents and carers have considered what is in the best interests of their child. This is particularly important where a child has SEND and/or a social worker and/or is otherwise vulnerable. Where a child has an EHCP, the local authority will need to review the plan, working closely with parents and carers.

If at any stage safeguarding concerns are identified, these will be referred to the Multi-Agency Safeguarding Hub without delay, in line with the procedures outlined above.

In any event, the Local Authority will be informed of a parental request for EHE.

If a parent wants to admit their child to a school, the normal processes for in-year admissions applications will be followed.

10.7 Children Requiring Mental Health Support

All staff must be 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. This can have a lasting impact throughout childhood, adolescence and into adulthood. Staff should be aware that these experiences can impact on children's mental health, behaviour, attendance and progress at school.

All academies have a nominated Mental Health Lead, who will implement a range of systems and processes to facilitate the identification of possible mental health problems.

Any concerns relating to mental health and wellbeing, including referrals and escalation to Child and Adolescent Mental Health Services, will be recorded on CPOMS. Academies will also make use of a range of internal and external interventions to support students experiencing mental health problems.

10.8 Children Absent from Education

All staff should be aware that children being absent from education for prolonged periods of time and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues. This may include abuse and neglect, which may include child sexual and child criminal exploitation – particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child becoming persistently absent or becoming a child missing in the future. Staff should be aware of their Academy's unauthorised absence and children missing from education procedures.

All academies will have appropriate arrangements in place to respond to children who are absent from education, particularly on repeat occasions and/or for prolonged periods, and will:

- Monitor attendance carefully and address poor or irregular attendance without delay
- Always follow up with parents/carers when students are not at the academy
- Take reasonable steps to obtain at least two up to date contacts numbers for parents/carers. Parents should remember to update the academy as soon as possible if the numbers change. Ensure staff understand what to do when children do not attend regularly
- Follow local authority policies and procedures in relation to children who go missing from education, including notifying the local authority of when a child is missing from education or being removed from roll at standard and non-standard transition points
- Ensure that staff understand the signs and indicators of students who may be at risk of FGM, forced marriage or travelling to conflict zones.

Students who are expected to attend the academy but fail to take up the place will be referred to the Local Authority.

When a student leaves the academy, robust records are maintained including the name of the student's new academy and their expected start date, wherever possible.

Working Together to Improve School Attendance (2024) guidance highlights that schools must ensure that they accurately complete attendance and admission registers and have effective day to day processes in place to follow-up absence. The guidance also places an emphasis upon regular analysis of attendance data and the implementation of effective and supportive strategies for identified pupils and cohorts. Information relating to daily attendance and absence protocols, and attendance support/intervention available to families, can be found within the Brooke Weston Trust Attendance and Punctuality policy.

11.	Recognising abuse: Training

11.1 The Trust is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect, exploitation or harm.

11.2 All staff, but especially the designated safeguarding lead (and deputies), should have the awareness to consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial (also known as contextual safeguarding) 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 violence, county lines, and radicalisation.

11.3 All staff

11.3.1 All staff members must undertake safeguarding and child protection training at induction (including online safety and whistleblowing procedures) to ensure they understand the Academy's safeguarding systems, their responsibilities and can identify signs of possible abuse, neglect or exploitation. The training must also include, amongst other things, an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This training will be regularly updated and will be in line with advice from the three safeguarding partners.

11.3.2 All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This should be renewed every 3 years, or more frequently depending on the academy's Prevent Risk Assessment.

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

11.3.4 Teachers and support staff as relevant to their role will receive training to ensure that they can manage behaviour effectively to ensure a good and safe educational environment and they should have a clear understanding of the needs of all Students.

11.3.5 Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

11.3.6 Volunteers will receive appropriate training, as applicable.

11.4 The DSL and Deputy DSLs

11.4.1 The DSL and Deputy DSLs will undertake Designated Safeguarding Lead training at least every 2 years.

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

11.4.3 They will also undertake Prevent awareness training and online safety training.

11.5 Governors and Trustees

11.5.1 All governors and trustees receive safeguarding and child protection (including online safety) training at induction. This includes, amongst other things, an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Training is regularly updated. Training is focussed on equipping them with the knowledge to provide strategic challenge to test and assure themselves that safeguarding policies and procedures in place in academies are effective and support the delivery of a robust whole school approach to safeguarding.

11.5.2 In the event that a governor of a BWT Academy has been unable to attend the annual safeguarding training sessions by the specified date for completion, their position as a governor will be reviewed by the Chair of Governors in discussion with the Principal/Associate Principal.

11.5.3 An annual record of training will be maintained.

11.5.4 As the Executive Principals and CEO may be required to act as the 'case manager' in the event that an allegation of abuse is made against a Principal or a member of the Central Team, they should receive training in managing allegations for this purpose.

11.6 Recruitment (interview panels)

11.6.1 At least one person conducting any interview for a post at the Academy will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2024), and will be in line with local safeguarding procedures.

11.7 Supervision

11.7.1 All DSL's and Deputy DSL's who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. This will take place at least half-termly.

11.8 Specific safeguarding issues

11.8.1 Staff will also receive appropriate levels of training and/or information on a range of thematic safeguarding issues, as referenced below. Further information about all of these concerns is available in Annex B of Keeping Children Safe in Education (2024):

- Abuse – including domestic, faith and relationship-based abuse
- Bullying
- Child abduction
- Children and the court system
- Children absent or missing from education.
- Children missing from home or care
- Children with a family member in prison
- Child exploitation – including sexual and criminal, county lines, modern slavery and trafficking
- Child on child abuse
- Cybercrime
- Drugs
- Health and wellbeing – fabricated illness, medical conditions, mental health
- Homelessness
- Online safety, including up skirting and the consensual and non-consensual sharing of nude and semi-nude imagery peer on peer abuse
- Private fostering
- Radicalisation and Prevent
- so-called 'honour-based' abuse, including forced marriage and FGM
- Violence – including serious violence, gangs, women and girls and sexual violence and harassment

11.8.2 Training will be provided through a range of delivery methods, to meet the needs of different groups of staff, and will be prioritised according to locally identified needs.

12.	Relationship Education, Relationship and Sex Education and Health Education

12.1 Through the curriculum, staff will ensure that children receive a preventative education that teaches them how to how to keep themselves and others safe, including online, and prepares them for live in modern Britain. This includes creating a culture of zero tolerance for sexism, misogyny/misandry, homophobic, biphobia and sexual violence and harassment.

12.2 Through regularly timetabled lessons, students receive an inclusive, age and stage appropriate Health Education, in addition to Relationships Education for primary pupils and Relationships and Sex Education for secondary pupils. Key messages are reinforced throughout the curriculum and staff will receive training to support them in the delivery of the curriculum. Schools will use a variety of methods to meet the needs of vulnerable children, including children who are victims of abuse, and children with special educational needs or disabilities. The curriculum will explore issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and quality
- Body confidence and self-esteem
- How to recognise an abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable

More information can be found in the Relationship Education, Relationships and Sex Education and Health Education Policy.

13.	Alternative Provision

13.1 All academies are responsible for the safeguarding of their students when they are placed in an alternative provision and must be satisfied that the placement meets the pupil's needs.

- Academies must obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff. This must be renewed at least annually.
- When commissioning placements at Alternative Provision, academies will confirm in writing the roles and responsibilities of the commissioning academy and the alternative provision in relation to the following:
    - o Attendance - clarifying responsibilities for responding to unexplained absences, persistent absence and severe absence.
    - o Behaviour – including ensuring that the alternative provision notifies the commissioning academy immediately if a child is suspended from school, outlining the reason and duration for the suspension and plans to monitor the safety and welfare of the child during the suspension.
    - o Progress and Attainment - ensuring that the alternative provision provides information to the commissioning academy on the curriculum being accessed by the placed student, their timetable and regular progress updates.
    - o Safeguarding, including ensuring that the alternative provision notifies the commissioning academy immediately if there are any safeguarding concerns for students.
- Academies must take responsibility for checking student attendance daily. Whilst registers will reflect the student's dual registration, attendance records must be maintained by the commissioning academy and must accurately represent the student's attendance at the alternative provision.
- Academies must maintain regular contact with parents, at least half-termly.
- Academies must visit Alternative Providers at least half-termly. During visits, academies must:

       o   Monitor and record student attendance
       o   Monitor and record student behaviour
       o   Monitor and record student progress and attainment
       o   Monitor and record safeguarding concerns
       o   Meet with placed students individually to check on their safety, wellbeing, and welfare.

- Commissioning academies must undertake an annual quality assurance check of the alternative provision, in addition to a cycle of random and planned visits, during which assurance should be obtained that the roles and responsibilities outlined above are being discharged consistently and effectively.

| **Staff Safeguarding Expectations** |

| **14.** | **Safer working practice** |

14.1 All staff work to create and embed a culture of openness, trust and transparency, in which the Trusts values and expected behaviour (as set out in the Professional and Safe Conduct Policy) are constantly lived, monitored and reinforced by all staff.

14.2 All staff must act with professionalism at all times. To reduce the risk of unsafe or harmful practice, safer working practice training should be included in annual training days and staff should be familiar with the Professional and Safe Conduct Policy, Acceptable Use Policy and Safer Recruitment Consortium document Guidance for safer working practice for those working with children and young people in education settings (February 2022).

14.3 The Board, Governors and senior leaders will ensure that this policy is adhered to 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 through effective training;
- empowering staff to share any low-level safeguarding concerns;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage; and
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- helping to identify any weakness in the academy's or Trust's safeguarding system.

14.4 Staff must adhere to the staff Professional and Safe Conduct Policy at all times. In the event of any concerns or allegations, the school will deal with them promptly, in line with local guidance and KCSIE (September 2024).

14.5 Staff use of personal mobile phones
- Staff will limit such use to times when students are not present. Staff members' personal phones will remain in their bags, cupboards or out of sight during contact time with students. Staff will not take pictures or recordings of pupils on their personal phones or cameras, or any other electronic devices with imaging and sharing capabilities.
- The General Data Protection Regulation and Data Protection Act 2018 will be adhered to when taking and storing photos and recordings for use in the school.
- Individual schools will have their own mobile phone guidance to be followed whilst on their sites, and staff should familiarise themselves with this.

| **15.** | **Abuse of trust** |

15.1 Inappropriate behaviour by staff towards students is unacceptable. Under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a student under 18 may be a criminal

offence, even if that student is over the age of consent. Other examples of inappropriate behaviour can be found in the Professional and Safe Conduct Policy. Such offences will be handled in line with the Dealing with Allegations of Abuse Against Staff.

15.2 Adults working or volunteering for, or on behalf of, the Trust must not have sexual relationships, or engage in any form of communication which could be interpreted as sexual, with any child or student (including those aged 18 or over). More information can be found in the Professional and Safe Conduct Policy.

16.	Safeguarding concerns about and allegations against members of staff

16.1 The Trust recognises the possibility that adults working in the Academy may harm children, including governors, volunteers, supply teachers and agency staff.

16.2 <u>**Allegations that may meet the harms threshold**</u>

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

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they 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.

This includes behaviour or incidents that have occurred in the Academy and outside of the Academy.

Staff who are concerned about the conduct of a colleague towards a student may worry that they have misunderstood the situation and may wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The Trust's Whistleblowing Policy and Dealing with Allegations of Abuse Against Staff Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

16.3 If a concern or allegation of abuse arises against any person working or volunteering on the school site (other than the Principal), this must be reported to the Principal immediately and not discussed directly with the person involved. This includes supply staff, volunteers and anyone working in or on behalf of the school, whether paid or unpaid. Alternatively, staff are able to report the concern through the Trust Whistleblowing Procedure or directly to the Designated Officer (details on p.5). Further detail is provided in the Dealing with Allegations of Abuse Against Staff Policy.

The Principal should consider if the concern or allegation meets the threshold for Designated Officer intervention. Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made, and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not have resigned.

16.4 If an allegation is made relating to an incident that happened when an individual or organisation was using the academy premises for the purposes of running activities for children, academies will follow the same safeguarding policies and procedures, including informing the LADO.

16.4 Allegations against the Principal or a member of the Central Team must be reported to the Director of Education. Andy.Burns@brookewestontrust.org

Allegations against the Director of Education or any member of the Executive Team must be reported to the CEO. Andrew.Campbell@brookewestontrust.org

Allegations against the CEO must be reported to the Chair of the Board. Please address your correspondence to: *Chair of the Board, Brooke Weston Trust, Deeble Road, Kettering, Northamptonshire NN15 7AA.*

16.5 **Safeguarding concerns that do not meet the harm threshold (low level concerns)**
In the event that there is a safeguarding concern about a member of staff, guidance outlined in Part 4, Section 2 of KCSIE (September 2024) will be adhered to.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college 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 allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

16.6 It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. All Academies will act quickly, proportionately and appropriately in the event of a low-level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also protects those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.
Staff will receive training about what may constitute a low-level concern. More information can be found in Part 4 of KCSIE (September 2024).

16.7 **Reporting low level concerns**
Low-level concerns should be reported to the Principal in line with the Low-Level Concern Policy. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept by the Principal/Associate Principal and/or HR.

The Principal may:
- Speak directly to the person who raised the concern (unless it has been raised anonymously).
- Speak to the individual involved and/or witnesses.

The Principal will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues within the Academy are identified, the Academy will either:
- take action through our disciplinary procedures;
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

The academy will retain information about low-level concerns until the member of staff is no longer employed by the Trust.

16.8 Supply staff

Although the academy does not directly employ supply teachers, any concerns or allegations against supply teachers are handled properly. No academy will cease to use a supply teacher for safeguarding reasons without finding out the facts and liaising with the Local Authority Designated Officer to reach a suitable outcome. The Principal will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation.

The academy will inform supply agencies of its process for managing allegations and will take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. Informing supply agencies of our process for managing allegations includes inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant school policies. Please also refer to the Managing Allegations Against Staff Policy.

17.	Recruitment and selection of staff

17.1 The Trust recognises that safe recruitment practices are an essential part of creating a safe environment for children and young people. Consequently, we will ensure that staff and volunteers working at the academy are suitable to do so, therefore, they do not pose any kind of risk to our students.

17.2 Safer recruitment should be reflected in every stage of the process and safeguarding judgements need to be made, in differing degrees, in relation to all those that a student in an academy may come into contact with, as they may be perceived to be safe and trustworthy adults.

17.3 The Trust will ensure that its recruitment and selection procedures include clear systems to vet all applicants before they are placed at an academy. Details can be found in the SCR, Safer Recruitment and Staff Files Policy.

17.4 The Principal will ensure that members of the Senior Management team have received training in Safer Recruitment and that all interview panels have a member of trained staff on them. Safer Recruitment training should be renewed at least every 3 years.

17.5 Where the Trust recruits temporary or supply staff through an agency, the Trust will ensure that assurance is sought from the agency that all relevant pre-employment checks have been conducted, as set out in the SCR, Safer Recruitment and Staff Files Policy. Supply staff will present a copy of their DBS certificate and ID on arrival at the school site.

17.6 Each academy will ensure that the following procedures are followed for contractors on site:
- Contractor to provide assurance that appropriate levels of pre-employment checks have been conducted.
- Employees of the contractor will present ID on arrival at the school site
- Acceptance by Academy/site of documentation.
- Site inserts copy of documentation into an "approved visitors" folder with register at reception. NB all documentation must be destroyed on completion of project.
- Contractor "signed into/onto" site and given formal site induction by Site Manager and safeguarding lead who outlines Safeguarding Policy/practice at earliest opportunity.
- Contractor issued with an "approved visitor" badge.
- Contractor conducts work.
- On departure signs out, returns badge and visit duration is recorded in approved visitor register.
- On subsequent visits contractor shows photo ID and signs in at reception. Reception refers to approved visitor register and records and alerts contractor to any known issues/risks/events.
- Site staff notified accordingly by reception staff.

- Approved visitor granted access to site to undertake work task.

18.	Single Central Record

18.1 Each academy will maintain a Single Central Record (SCR) of all Academy employees, agency staff, volunteers (including governors), contractors and any others involved in regulated activity (including Alternative Provision).

18.2 The SCR will be overseen and directly managed by the Principal, with the support of the DSL, who is responsible for safeguarding in the academy and the academy safeguarding leadership team. It is the responsibility of the HR Administrator/equivalent within the academy to maintain the information on the single central record.

18.3 Audits will be conducted half-termly, by the Designated Safeguarding Lead and Principal alternately. The Trust HR Manager will complete annual audits of the SCR.

18.4 The details of an individual should be removed for the SCR once they no longer work for the Academy and/or Trust.

18.5 A SCR will be maintained centrally for all Central Team and Trust-wide members of staff and Directors/subcommittee members. This will be shared with all Brooke Weston Trust academies as and when it is updated.

18.6 For further information about DBS checks, please refer to the Trust's Disclosure and Barring Service Checks Policy.

Records

19.	Confidentiality and information sharing

19.1 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. Staff should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

19.2 Academies have clear powers to share, hold and use information for these purposes. The General Data Protection Regulation (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between each Academy, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need. If staff are unsure whether information should be provided, advice should be sought from the Data Protection Officer.

19.3 All academies adhere to the Data Protection Act (2018) and the General Data Protection Regulation (2018), and will be guided by the DfE Data Protection guidance for schools.

19.4 Sharing information with parents:
- Each academy will ensure the Safeguarding and Child Protection Policy is available publicly on each academy's website and on the Brooke Weston Trust website.
- Where appropriate, staff will discuss any concerns about a child with the child's parents. The Designated Safeguarding Lead (DSL) will normally do this in the event of a concern, suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.
- If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

19.5 Consent:

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk, or where it is not possible to gain consent. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

19.5 As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.

19.6 When considering whether, or not, to share safeguarding information (especially with other agencies), staff will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

19.7 All staff in each Academy will be made aware of their duties in relation to Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:
- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.

20.	Record keeping and File Transfer

20.1 All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

20.2 When a child has made a disclosure, the member of staff/volunteer should;
- record as soon as possible after the conversation, using CPOMS
- not destroy the original notes in case they are needed by a court (this includes notes taken by the member of staff);
- record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
- Use a CPOMS body map to indicate the position of any injuries if relevant; and
- record verbatim statements and observations within records, rather than interpretations or assumptions

20.3 For staff who are unable to access CPOMS, including Central Staff who work across multiple academies, concerns should be recorded using the BWT Safeguarding Concern Form (See Appendix E). Copies of this form must be printed on brightly coloured paper, so that they can be easily identified. The form must be completed in full and in written form, and handed to a member of the Safeguarding Team immediately, who must sign, time and date the form to acknowledge receipt. A member of the Safeguarding Team must then upload the concern form to CPOMS on the same working day. If CPOMS is unavailable, concern forms must be uploaded at the earliest possible opportunity and attached to the relevant child's profile.

20.4 All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

20.5 The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005. All concerns, discussions and decisions made, and the

reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.

20.6 Records will include:
- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any action taken, decisions reached and the outcome.

20.7 Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with the records retention schedule.

20.8 If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. The transfer will take place as soon as possible, and within 5 days for an in-year transfer and within 5 days of the start of a new term. Confirmation of receipt will be obtained. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

20.9 When receiving child protection files for new students, academies will ensure that key staff (such as the DSL and SENCO) are aware, as required.

20.10 The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 is in place to protect the personal information of individuals. It does not prohibit information about children being shared with specific authorities if it is for the purposes of safeguarding children and individuals at risk. Information that could be relevant to keeping a child safe should be shared so that informed decisions can be made about a child's welfare. We have a duty of care for our students and safeguarding is of upmost importance to us. GDPR does not 'trump' safeguarding. Processing safeguarding data is necessary for compliance with our legal obligation to which Brooke Weston Trust is subject. Therefore, consent is not needed for the effective sharing of safeguarding information between an academy and relevant authorities.

20.11 Upon receipt of any request regarding direct access to academy documentation on a Child Protection file, the Principal and DSL will be informed and a decision taken on the appropriate way forward in accordance with the Data Protection Policy.

20.12 Any external individual or organisation contracted by the academies to work with academy students must report any child protection incidents or disclosures from students to the Principal or DSL at the earliest opportunity. Such bodies will, as part of their contractual arrangements with the academies, be required to work in accordance with the Trust's child protection and safeguarding policy.

Additional Information

21.	Use of physical interventions

21.1 There is an absolute ban on the use by any member of staff of any form of corporal punishment. This includes any physical contact which is deliberately intended to punish a student, or which is primarily intended to cause pain, injury or humiliation.

21.2 It is important to allow children to do what they can for themselves, but depending on age and circumstances, it may be necessary for some physical contact to take place; (e.g., a child who is hurt, who needs instruction in the use of a particular instrument/piece of equipment, safety issues such as the need to prevent a child hurting themselves, running into the road etc.).

21.3 Section 93 of the Education and Inspections Act 2006 enables Academy staff to use 'reasonable force' to prevent a student from:
- committing any offence (or, for a student under the age of criminal responsibility, what would be an offence for an older student);

- causing personal injury to, or damage to the property of, any person (including the student themselves); or
- prejudicing the maintenance of good order and discipline at the Academy or among any students receiving education at the Academy, whether during the teaching session or otherwise.

21.4 Reasonable force means using no more force than is needed. When using reasonable force in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, staff will recognise and consider the additional vulnerability of these groups and seek to reduce the need to use reasonable force by planning positive and proactive behaviour support and working with parents and carers.

21.5 Authorised Academy staff may, under certain circumstances, use reasonable force to carry out a search. These include, but are not limited to, searches for knives and weapons, alcohol and illegal drugs, stolen items and items that could be used to commit and offence or cause injury to self or others, as identified in Paragraph 3 of the DfE Searching, Screening and Confiscation guidance. In the event of searches or physical restraint being needed, parents will be informed the same day, and all searches and uses of physical intervention will be recorded on CPOMS. See Appendix A for more information on searching.

22. Use of Academy premises for non-Academy activities

22.1 All lettings are managed by Edu Lettings. Brooke Weston Trust will seek assurance that Edu Lettings ensures that all providers renting or hiring academy facilities have appropriate arrangements in place to keep children safe.

22.2 When services are provided under the direct management of the Academy, the Academy's safeguarding and child protection procedures apply. If this is not the case the Academy must seek assurances that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as required), and ensure that there are arrangements in place for the provider to liaise with the academy on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. Providers will be asked to adhere to the requirements of Keeping Children Safe in Out-Of-School Settings.

22.3 Safeguarding arrangements must be included in any transfer of control agreement (such as letting or hire agreement). Failure to comply with this would lead to termination of the agreement.

23. Early years settings within academies

23.1 As an early year's provider delivering the Early Years Foundation Stage (EYFS), all Brooke Weston Trust primary academies aim to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2

23.2 All BWT Primary academies will ensure that all children in the nursery and reception classes, and/or two-year old provision, are able to learn, develop, be safe and healthy by providing;
- a safe secure learning environment;
- a member of staff who holds a current, paediatric first aid certificate is available on the premises at all times, and accompanies children on Academy trips;
- a designated key worker who liaises with parents and carers;
- routine monitoring of health and safety practices, to promote children's safety and welfare;
- Appropriate staffing, ratios and qualifications comply with statutory guidance and can meet the needs of all children;
- an environment where children can be seen and heard at all times;
- a member of staff responsible for leading on safeguarding within the early years; and

- training and development for all staff so they are able to take appropriate action where there are safeguarding or child protection concern.

24.	Complaints

24.1 The Brooke Weston Trust's complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Complaints are managed by senior staff, the Principal/Associate Principal and governors and in exceptional circumstances the Chief Executive. Complaints from staff are dealt with under the Academy's complaints and disciplinary and grievance procedures (TPO/QA/02).

25.	Safeguarding Adults at Risk

25.1 Adults at risk include any adult who:
- A) has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- B) is experiencing, or at risk of, abuse or neglect, and;
- C) as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

25.2 The Care Act (2014) identifies the following categories of adult abuse and harm:
- Physical
- Sexual
- Emotional/Psychological
- Neglect and acts of omission
- Financial or material abuse
- Discrimination
- Organisations/institutional abuse
- Domestic abuse (including coercive control)
- Modern slavery

25.3 When supporting adults at risk, the Trust will act in line with the following principles as set out in the Care Act (2014):
- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent.
- **Prevention –** It is better to take action before harm occurs.
- **Proportionality –** The least intrusive response appropriate to the risk presented.
- **Protection –** Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

25.4 If any member of the Trust community has a concern about the safety or welfare of an adult at risk, this should be reported to a DSL or DDSL immediately. Where the subject of the concern is a student (e.g., in Sixth Form), or has links to a current student, the concern should be logged on CPOMS. In all other cases, staff should speak to the DSL/DDSL for advice.

25.5 When responding to concerns about adults at risk, DSLs/DDSLs will be guided by the principles above and will seek advice from Adult Social Care (see Section 1.8).

26.	Policy Review

26.1 This policy will be reviewed annually or as required by legislature changes.

Appendix A – Strip Searches and Appropriate Adults

The following information is taken from the DfE guidance on Searching, Screening and Confiscation (2022) and the Police and Criminal Evidence Act.

Strip Searches

A strip search is a search involving the removal of more than outer clothing. Strip searches on school premises can only be carried out by police officers under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C. While the decision to undertake the strip search itself and its conduct are police matters, staff retain a duty of care to the students involved and should advocate for student wellbeing at all times. **Staff are not permitted to conduct strip searches on students.**

Before calling police into school, staff should assess and balance the risk of a potential strip search on the student's mental and physical wellbeing and the risk of not recovering the suspected item. Staff should consider whether introducing the potential for a strip search through police involvement is absolutely necessary, and should always ensure that other appropriate, less invasive approaches have been exhausted. Once the police are on school premises, the decision on whether to conduct a strip search lies solely with them, and the role of the school is to advocate for the safety and wellbeing of the student(s) involved.

Unless there is an immediate risk of harm and where reasonably possible, staff should inform a parent of the student suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents should always be informed by a staff member once a strip search has taken place. Schools should keep records of strip searches that have been conducted on school premises and monitor them for any trends that emerge.

Except in cases of urgency where there is risk of serious harm to the student or others, whenever a strip search involves exposure of intimate body parts there must be at least two people present other than the pupil, one of which must be the appropriate adult (see below). If the student's parent would like to be the appropriate adult, the school should facilitate this where possible. Police officers carrying out the search must be of the same sex as the student being searched. An appropriate adult not of the same sex as the student being searched may be present if specifically requested by the student. Otherwise, no-one of a different sex to the student being searched is permitted to be present, and the search must not be carried out in a location where the student could be seen by anyone else.

Except in urgent cases as above, a search of a student may take place without an appropriate adult only if the student explicitly states in the presence of an appropriate adult that they do not want an appropriate adult to be present during the search, and the appropriate adult agrees. A record should be made of the student's decision and signed by the appropriate adult. The presence of more than two people, other than an appropriate adult, shall be permitted only in the most exceptional circumstances.

Strip searching can be highly distressing for the student involved, as well as for staff and other students affected, especially if undertaken on school premises. PACE Code C states that a strip search may take place only if it is considered necessary to remove an item related to a criminal offence, and the officer reasonably considers the student might have concealed such an item. Strip searches should not be routinely carried out if there is no reason to consider that such items are concealed.

Students will be given appropriate support, irrespective of whether the suspected item is found. If an item is found, this may be a police matter, but should always be accompanied by a safeguarding process handled by the school which gives attention to the student's wellbeing and involves the DSL/DDSL. Safeguarding should also be at the centre of support following a strip search in which the item is not found, both in the sense of supporting the student

to deal with the experience of being searched, and regarding wider issues that may have informed the decision to conduct a strip search in the first place. In both cases, students should feel that they have an opportunity to express their views regarding the strip search and the events surrounding it. School staff should give particular consideration to any students who have been strip searched more than once and/or groups of pupils who are more likely to be subjected to strip searching with unusual frequency and consider preventative approaches.

Appropriate Adults

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code. PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS. If having been informed of the vulnerabilities, the DSL or DDSL does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

The 'appropriate adult' means, in the case of a child:

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.

2. a social worker of a local authority

3. failing these, some other responsible adult aged 18 or over who is not:

    a. a police officer;
    b. employed by the police;
    c. under the direction or control of the chief officer of a police force; or
    d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.

https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

Appendix B – FGM Reporting Process Map

Professionals should:
- Record all decisions
- Communicate sensitively with the girl/family

Relevant professional concerned that an under 18 has had/is at risk of FGM.

Where there is a risk to life or likelihood or serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate.

Informed by the girl that she has had FGM

Observes physical signs which appear to show FGM has been carried out

Suspects FGM has been carried out

Considers girl may be at risk of FGM

Mandatory reporting duty applies

Follow local safeguarding procedures (mandatory reporting duty does not apply)

Professional required by law to make a report to the Police (orally or in writing – **recommended route: call 101**)

Local safeguarding procedures followed

Response initiated by police, in consultation with local authority children's social care

Response initiated by local authority children's social care

IMMEDIATE RESPONSE REQUIRED re: identified victim or another child/other children

Police and social care take immediate action as appropriate

ASSESSMENT OF CASE: multi-agency safeguarding meeting convened in line with local safeguarding arrangements.

Attendees include:
- Police
- Children's social care
- Health

Factors considered may include:
- Measures to protect the girl/others identified as being at risk (children's social care lead)
- Possible criminal investigation (police lead)
- Health and wellbeing requirements of the girl/others, including how care delivered (health lead)

Police provide feedback on cases reported under mandatory reporting duty.

Appendix C – Main Issues within our academy/locality				
Academy (Local Authority)	**Main issues identified in the academy and local area**	**How our curriculum addresses these issues**	**Training staff have received or will receive to address these issues**	**How our academy promotes positive messaging about tackling these issues with key stakeholders**
Beanfield Primary Academy (North Northamptonshire)	• Child Mental Health • Domestic Abuse • Neglect • Poverty • Physical Abuse	• Personal development curriculum with a focus on key issues such as relationships, wellbeing, emotions, drugs education, digital lifestyles, online safety, money, managing risk. • Individualised bespoke 1:1 work as necessary as necessary. • External agencies such as NSPCC, Youth Violence Intervention Team, MHST carrying out education for children. • Assemblies delivered by internal staff and external agencies such as PCSOs. • National weeks celebrated in school. • Daily bespoke nurture class focusing on education such as therapeutic interventions, personal safety, protective behaviours.	• Annual safeguarding training which highlights local context. • Additional support from external agencies delivering bespoke training. • Updates as necessary provided to all staff throughout the year. • Tea-break guides. • Safeguarding snapshots emailed to staff. • Graded Care profile trained staff. • Mental Health First Aiders for Adults and Youth	• Safeguarding report to governors, discussed at every meeting. • Safeguarding governor visits. • Social media messages giving advice and helplines. • Website information. • Dojo communication to parents. • National recognised weeks celebrated in school. • Reports shared to BWT Safeguarding Review Group. • Half termly safeguarding newsletter sent to parents.
Brooke Weston Academy (North Northamptonshire)	• Mental Health • Exploitation • Domestic abuse • Child on Child abuse • Substance abuse	• PSHE lessons. • IT lessons. • Assemblies. • Workshops. • Tutor time curriculum.	• Annual safeguarding training which highlights local context and updates as necessary provided to	• Regular updates including "Wake Up Wednesday and Mindful Monday". • Regular website and social media updates for parents.

Appendix C – Main Issues within our academy/locality				
Academy (Local Authority)	**Main issues identified in the academy and local area**	**How our curriculum addresses these issues**	**Training staff have received or will receive to address these issues**	**How our academy promotes positive messaging about tackling these issues with key stakeholders**
		- Holiday care pack. - Working with local agencies including: - School nurse - PCSO - Police - Councillors - CAMHS - MHST - NGAGE - CIRV	- all staff throughout the year. - Whole staff safeguarding training. - Safeguarding briefings. - Training provided to individual staff following any identified need. - Updates provided to staff at regular intervals throughout the year. - Tea Break guides for all staff.	- Displays in prominent places around school. - Wellbeing Team present at parents' evenings. - Information included in induction. - Regular updates to Governors.
Compass Primary Academy (North Northamptonshire)	- Child Mental Health - Parent Mental Health - Poverty - Neglect - Domestic Abuse - Physical Abuse	- Zones of Regulation curriculum delivered across all year groups and individual toolkits in place. - External agencies such as NSPCC; Service Six; OPFCC; School Nursing; Community Safety Team delivering assemblies/ workshops/ bespoke interventions. - Safety assemblies with a specific safety element/topic each week. - Personal Development curriculum which focuses on and promotes healthy relationships; staying safe in the community; managing	- Weekly safeguarding briefings for all staff. - Bespoke training delivered by external partners. - Annual safeguarding training and regular updates throughout the year which discuss local context. - Domestic Abuse training attended by DSLs. - Graded Care Profile attended by DSL and EWA. - Mental Health First Aid trained staff. - ELSA training completed by Pupil Champion.	- Safeguarding briefings shared with governors. - Termly report to governors and discussion during termly meetings. - Regular liaison/visits with Chair of Governors. - Information shared on school website/class dojo/social media. - Half-termly wellbeing newsletter. - Recognition and promotion of national weeks. - Opportunities for parents/carers to sign their child up for bespoke workshops/ interventions offered. - Playground display boards/information stand in main office.

Academy (Local Authority)	Main issues identified in the academy and local area	How our curriculum addresses these issues	Training staff have received or will receive to address these issues	How our academy promotes positive messaging about tackling these issues with key stakeholders
		wellbeing; online safety; drugs/alcohol awareness/knife crime awareness. • 1:1 pastoral and small group interventions, including Protective Behaviours and Drawing and Talking. • Recognition of national weeks.		
Corby Business Academy (North Northamptonshire)	• Mental Health • Online Safety • Welfare • Attendance • Bereavement	• Personal Development lessons. • Assemblies, tutor time. • RSE curriculum. • Student Care Team/Room. • Awareness Days. • Mentoring sessions. • Interventions (Bespoke). • External Interventions. • Workshops. • Protective Behaviours. • Zones of Regulation (Unit). • PCSO. • Attendance Strategy (Trust)	• Annual Safeguarding training. • Safeguarding e-Bulletins. • Mental Health bulletins. • Internal CPD. • National College. • MHST. • Weekly safeguarding briefings. • Online Safety Team meetings. • Bespoke training by external agencies. • BWT CPD Centre.	• Governor reports. • Website and social media updates. • Safeguarding governor visits. • Trust Head of Safeguarding visits. • AIB. • Safeguarding Review. • Parent/Student/Staff surveys. • Social Media. • Notice boards/displays/posters. • Student Care Team present at Open Evenings. • Contextual Safeguarding meetings.
Corby Technical School (North Northamptonshire)	• Harmful Sexual Behaviours • Substance misuse (including Vaping) • Student Mental Health • Online Safety	• PSHE Curriculum and personal development curriculum cover all statutory areas and are revised regularly in response to Safeguarding priorities. • Assemblies.	• Annual Safeguarding Training. • Safeguarding updates. • Key staff receive 'Working together to safeguard children' training. • Mental Health First Aider training.	• National Online Safety. • Website information. • Safeguarding governor visits. • Termly Safeguarding updates in Governor meetings. • Safeguarding updates in SLT meetings. • Trust Led visits.

Appendix C – Main Issues within our academy/locality				
Academy (Local Authority)	**Main issues identified in the academy and local area**	**How our curriculum addresses these issues**	**Training staff have received or will receive to address these issues**	**How our academy promotes positive messaging about tackling these issues with key stakeholders**
		• National Days (Mental health awareness week and Anti-bullying week). • Workshops. • Interventions (student support team). • Interventions (external). • Think for the Future. • Celebration of Culture week. • County Schools Challenge.	• DSL and DDSL Specialist training. • National Online safety training. • National College training. • Senior Mental Health Lead. • Safeguarding notices and briefings.	• Trust Review of Academy. • MHST Survey and communication. • Student voice and feedback. • Positive media stories. • Posters to identify DSL's and Mental Health First Aid staff. • Online safety boards. • Contextual Safeguarding Meetings.
Gretton Primary Academy (North Northamptonshire)	• Child Mental Health • Parenting challenges linked to parental separation • Neglect	• Zones of regulation curriculum taught to provide children with strategies to manage regulation in school. • 1:1 pastoral interventions being provided by Education Welfare Assistant. • Personal development curriculum has a strong focus on developing resilience. • External agencies such as Service Six, the Sarah Agnes Foundation used to support key children with specific needs. • High levels of joined up working between DSLs and SENCO to ensure children are getting the support they need.	• Rowangate outreach have delivered INSET training to all staff on attachment and trauma to support our understanding. • Staff have had two INSET days (one whole Trust Primary and one Gretton specific) on the Therapeutic Behaviour approach to support the implementation of the new behaviour policy. • Key staff have attended training led by Maplefields on supporting children with SEMH needs in the classroom at the PTH.	• Regular updates to governors. • Parent surveys to find out how confident they are talking to children about key issues e.g., online safety. • Social media signposts. • Website signposts. • Newsletter updates for parents.

Appendix C – Main Issues within our academy/locality				
Academy (Local Authority)	**Main issues identified in the academy and local area**	**How our curriculum addresses these issues**	**Training staff have received or will receive to address these issues**	**How our academy promotes positive messaging about tackling these issues with key stakeholders**
		• Assemblies with a specific focus linked to issues within the school community.		
Kettering Science Academy (North Northamptonshire)	• Mental Health • Substance Misuse • Weapons • Harmful sexual behaviour • Online safety • Neglect	• PSHE lessons. • Assemblies. • Knife crime workshops. • Anti-bullying ambassadors. • External speakers/visitors. • Student voice. • Drop down sessions. • 5 ways to wellbeing. • School counsellor. • Wellbeing drop-in sessions. • LGBTQ+ group. • Computing curriculum. • Mental Health Lead. • Mental health first aiders. • PCSO School Liaison Officer.	• Safeguarding training. • Suicide prevention training. • Intra familial abuse training. • Working together to safeguard children. • Staff safeguarding updates. • RISE – CSE/CCE training. • Tea break guides. • Online safety lead training. • Managing behaviour with trauma in mind. • Graded profile training. • MHST training sessions.	• School website. • Mental health awareness week. • Anti-bullying week. • Pride month. • Parent safeguarding newsletter. • Parent/student/staff surveys. • Trust Safeguarding Review. • Safeguarding Governor visits. • Safeguarding leaflet for all visitors. • Parent presentation.
Oakley Vale Primary School (North Northamptonshire)	• Domestic Abuse • Neglect • Physical Abuse • CSE/CCE	• Broad and balanced PSHE & PD curriculum. • Extensive extra -curricular opportunities. • Safeguarding Curriculum Group in place to ensure proactive and reactive responses. • Class assemblies prescribed by the Safeguarding Curriculum Group.	• Annual safeguarding training which highlights local context. • Updates as necessary provided to all staff throughout the year. • Weekly safeguarding briefings disseminated to all staff. • Training provided to individual staff following	• Updates included in the regular school newsletter. • Regular website and social media updates for parents. • Displays in prominent places around school • 'Wellbeing Team' leaflet created to explain support available. • Wellbeing Team present at parents' evenings with information regarding

Appendix C – Main Issues within our academy/locality				
Academy (Local Authority)	**Main issues identified in the academy and local area**	**How our curriculum addresses these issues**	**Training staff have received or will receive to address these issues**	**How our academy promotes positive messaging about tackling these issues with key stakeholders**
		• RSE curriculum. • Dedicated wellbeing space. • National awareness Days. • External support with specific interventions. • Individualised bespoke curriculum as required. • Workshops (Parent & Child) • Zones of Regulation. • 1:1 pastoral and small group interventions, including Protective Behaviours and Drawing and Talking.	any identified need from regular safeguarding questionnaires. • Maplefields Outreach have delivered training on support children with SEMH needs. • Data summaries provided to staff at regular intervals throughout the year. • Therapeutic Thinking behaviour training (formerly STEPS) attended by key leaders and disseminated to staff.	specific issues and where to get support. • Information included in 'new starters' pack. • Regular updates to Governors.
Peckover Primary School (Cambridgeshire)	• Neglect • Online safety • Child and adult mental health • Domestic abuse • Housing issues • County lines (emerging)	• Zones of regulation. • Whole school assemblies. • Online safety group/safeguarding group. • PSHE and computing curriculum and PD curriculum. • Class assemblies • National days/weeks of recognition e.g., online safety.	• Weekly safeguarding bulletins. • Annual safeguarding training in September 24. • CDP is identified by staff on PD forms and in discussion. • Updates throughout the year. • Mental health first aider training. • DSL and DDSL refreshers as required. • Local safeguarding network meetings	• Governors' reports. • Governor visits termly. • School council • Website information. • Parent newsletters. • School displays. • Parent surveys linked to online safety. • Safeguarding briefings. • Dojo communication to parents. • Information included in our new intake packs. • Support for parents e.g., on an individual basis as required. • Online safety evening/PM/Zoom session for parents.

Appendix C – Main Issues within our academy/locality				
Academy (Local Authority)	**Main issues identified in the academy and local area**	**How our curriculum addresses these issues**	**Training staff have received or will receive to address these issues**	**How our academy promotes positive messaging about tackling these issues with key stakeholders**
			• Free PSHE and DA webinars. • Trust wide training i.e. protective behaviours, drugs awareness and supervision training. • Mental health support team training • Recovery through relationships training for teachers and some TAs.	• Student online safety ambassadors presenting in assemblies and online safety session to parents. • Assemblies.
The Wisbech Academy (Cambridgeshire)	• Neglect • Child sexual abuse • Child Exploitation • Messages from case reviews • County Lines/CCE • Domestic Abuse: Support for children & families • Homelessness/Eviction • Alcohol/Substances misuse • Self-Harm • Low Mood • Parenting	• Assemblies. • External Agency Work. • Parental information. • Safer school Police partnership. • Mentoring. • Student Voice. • Tutor time activities. • Intervention. • School counsellor • Mental Health Champions (PSHE).	• BWT safeguarding training for staff who are new to BWT. • Annual safeguarding training. • Weekly safeguarding information distributed in staff briefing. • Bi-weekly mental health information distributed in staff bulletin. • National College Training. Individual training where required/needed	• Termly governors report. • Social Media. • School Website. • Anti-bullying week. • Young Carers celebration • AIB: Safeguarding • AIB days: Attendance. • Parental Sway. • Parental Meeting.
Thomas Clarkson Academy (Cambridgeshire)	• Neglect • Child sexual abuse • Child Exploitation • Messages from case reviews • County Lines/CCE	• Assemblies. • External Agency Work. • Parental information. • Safer school Police partnership. • Mentoring.	• Annual safeguarding training. • Weekly safeguarding information distributed in staff briefing.	• Termly governors report. • TCA Social Media. • School Website. • Anti-bullying week. • Young Carers celebration • AIB: Safeguarding

Appendix C – Main Issues within our academy/locality				
Academy (Local Authority)	**Main issues identified in the academy and local area**	**How our curriculum addresses these issues**	**Training staff have received or will receive to address these issues**	**How our academy promotes positive messaging about tackling these issues with key stakeholders**
	• Domestic Abuse: Support for children & families • Homelessness/Eviction • Alcohol/Substances misuse • Self-harm • Low Mood • Parenting	• Student Voice. • Tutor time activities. • TCA Family worker intervention. • School counsellor • Mental Health Champions (PSHE).	• Bi-weekly mental health information distributed in staff bulletin. • Recovery through relationship training • FAS External training. • National College Training. • Individual training where required/needed	• AIB days: Attendance. • Parental Sway. • Parental Meeting.
Thrapston Primary School (North Northamptonshire)	• Child Mental Health - Low mood/ Self-harm • Online safety • Attendance	• Individual & group sessions running with Pastoral care team. • Opportunity for counselling play therapy sessions. • External agency visits to promote mental health/ welfare. • Student voice. • Assemblies. • Evening for parents with external agency to look at dangers online. • Police visit to the school. • Year 6 leaders to support (Champions).	• Annual safeguarding training. • Mid- year safeguarding update. • Bulletin/ Tea break guides sent out. • National college training- further training for those who require. • Mental health lead to prioritise mental health, educate staff on upcoming changes and issues.	• Child risk assessment where required. • Termly governor meetings/ reports. • School website updates and relevant links. • Assemblies. • Online safety evening for parents to educate. • Parent newsletters updates. • Display boards.

Appendix D: BWT Safeguarding and Child Protection Policy – Summary of Key Information

General Principles – All staff must:
- Understand that safeguarding is everyone's responsibility and ensure that their conduct is child centred and in line with the Professional and Safe Conduct Policy and Acceptable Use Policy.
- Be able to identify the Designated Safeguarding Lead (DSL) and Deputy DSLs.
- Be alert to signs of abuse, neglect and exploitation and report and record concerns in line with this policy.
- Read Part 1 and Annex B of Keeping Children Safe in Education and undertake annual safeguarding training.
- Understand the contextual safeguarding concerns identified by their academy (see Appendix C).

Responding to and Recording Concerns
- If a child discloses abuse, neglect or exploitation or is at imminent risk of harm, this must be reported immediately and in person to a DSL or DDSL. Staff should explain to the child what action they plan to take, including who will be informed.
- When handling disclosures, staff should remain professional, provide their full attention, and listen carefully to the child. Staff should reassure the child, and must not judge or blame, ask leading questions or promise confidentiality. Children making disclosures of abuse should not be asked to write down their disclosure.
- Any concerns for a child's safety or welfare must be recorded on CPOMS under the category of 'Safeguarding Concern' before the end of the school day. Urgent concerns, or disclosures of abuse, must be reported immediately.
- Records should be made as soon as possible after a concern arises. Staff must not destroy original notes as these may be required as evidence in court.
- Records should made in a timely manner. They should be professional, objective, succinct, accurate and child centred. They should not include interpretations or assumptions.
- All incidents of physical intervention (use of reasonable force) must be logged on CPOMS.

Specific Concerns – All Staff Must:
- Consider whether children are at risk of abuse or exploitation in situations outside of their families (extra-familial harm), reporting and recording any concerns that arise.
- Report disclosures of Female Genital Mutilation to the DSL and to the Police. The DSL will support staff to report incidents to the police.
- Be aware of the Prevent Duty and have due regard to the need to prevent people from being drawn into terrorism. All staff should promote the fundamental British Values.
- Have a basic understanding about how filtering and monitoring is used within each academy to keep children safe online. Concerns relating to online safety should be logged on CPOMS.
- Be aware that children can abuse other children (child on child abuse) inside or outside of the academy and respond with the same rigour as they would for incidents involving adults.
- Adopt a zero-tolerance approach to sexual violence and sexual harassment. Staff should adopt an attitude of "it could happen here" and must never dismiss incidents as "banter". Staff must understand the meaning of "consent" and ensure that incidents of sexual violence and sexual harassment are challenged, recorded and reported immediately.
- Be 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. Staff should be aware that trauma and adversity can have a lasting impact on a child's mental health, behaviour, attendance and progress at school. Concerns about a child's mental health should be recorded on CPOMS under the 'Safeguarding' category.

Low Level Concerns, Allegations and Whistleblowing
- Low level concerns and allegations must be reported. Concerns about adults must be reported to the Principal. Concerns about the Principal or a member of the Central Team (excluding the Executive Team) must be reported to the Director of Education. Concerns about members of the Executive Team must be reported to the Chief Executive Officer. Concerns about the Chief Executive Officer must be reported to the Chair of the BWT Board.
- The Trust Whistleblowing Officer is James Down. Contact details can be found in Section 1 of this policy.

Appendix E – BWT Safeguarding Concern Form (Double-Sided)

This form should only be used by staff who do not have access to CPOMS, or if CPOMS is unavailable. The Form should be handwritten clearly, completed in full and signed. Completed forms must be handed, in person, to a member of the safeguarding team.

Student Name			
Student Year Group			
Time of Incident		**Date of Incident**	

Incident *If this concern is URGENT, you must speak to a DSL immediately. Records should be professional, objective, accurate and succinct. Use full names, avoid acronyms and check spelling and grammar carefully.*

Voice of the Child: *Use this space to capture the child's perspectives, wishes and feelings. Specify whether the child is aware that the concern is being logged.*

Action: *Use this space to describe any action you have taken, or action you intend to take.*

Linked Students: *Include the full name and year group of linked students*

Name of Person Reporting		Signature	
Time Completed		**Date Completed**	
Role of Person Reporting			

To be Completed by Safeguarding Team

Name of Person Receiving		Signature	
Time Received		Date Received	

Safeguarding Tean Chronology (For Use if CPOMS is unavailable)

Time	Date	Name	Action Taken

Form Uploaded to CPOMS	
Name of Person Uploading	
Signature of Person Uploading	

Appendix F – Equality Impact Assessment

Name of Assessment	Safeguarding and Child Protection Policy
Name of completing officer	
Date of Assessment	01.08.2024
Approved by	
Date of Approval	
Review Date (if applicable)	

The Public Sector Equality Duty places a general duty on all public bodies to have due regard to the need to achieve the objectives set out under s149 of The Equality Act 2010;

- To eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under The Equality Act.
- To advance equality of opportunity for those covered by The Equality Act
- To foster good relations

We do this by undertaking Equality Impact Assessments (EIAs) to help us consider and understand the implications of policies and decisions on people with protected characteristics. It is a way to make sure individuals and teams think carefully about the likely impact of their work on employees and take action to improve activities, where appropriate.

Part 1 should be completed to determine if a full EIA is needed. If it is determined that a full EIA is needed, then section 2 should also be completed.

Guidance on the toolkit is set out in Appendix 1

All assessments must be approved and included as an appendix to any written policy.

Part 1 – Screening

The following questions should be completed to determine if the full EIA is required.

- If you answer **YES** to **any** of the screening questions, complete Part 2 Equality Impact Assessment
- If you answer **NO** to **any** of the screening questions, provide supporting evidence that explains your answer
- If you answer **NO** to **all of** the questions, include the following statement within the policy "This policy / project was screened for impact on equalities on [insert date]. The following evidence [Evidence] has been considered. No full equality impact assessment is required."

Question	Yes/No	Include any explanation required
1. Does the policy affect employees or service users? *(A potential to affect a small number of people in a significant way is as important as a potential to affect many people)*	Yes	The policy applies to all staff and students.
2. Are there any aspects of the policy that could contribute to equality or inequality?	Yes	The policy outlines roles and responsibilities and processes for ensuring children and young people are safe and protected from harm.
3. Does it relate to an area where there are known inequalities? *(for example, disabled people's access to public transport, the gender pay gap, racist or homophobic bullying in schools, educational attainment of Gypsies and Travellers, etc).*	Yes	Yes Outcomes for students with special educational needs and/or disabilities.
4. If this is an amendment of an existing policy, was the original policy impact assessed?	Yes, Yes	This is an amendment due to statutory changes (Keeping Children Safe in Education September 2024).
Is an Equality Impact Assessment needed?	Yes	

Part 2 – Equality Impact Assessment

Summary of aims and objectives of the policy / activity / event etc being assessed
Set out what provision is currently in place and who the current stakeholders are. *What is the proposal to be considered, or what changes are being made to the current provision/policy/activity?* The Brooke Weston Trust commits to providing an environment which safeguards and promotes the welfare, safety, health and guidance of our students. The Brooke Weston Trust recognises the importance of the contribution it can make to protecting and supporting students across its academies. The policy covers legal duties as set out in Keeping Children Safe in Education (KCSIE) (September 2024) and Working Together to Safeguard Children (2023) and the processes and responsibilities to implement them. Stakeholders are staff, students, parents/carers, local authority, external agencies, Local Governing Body and BWT governance.

What involvement and consultation has been done in relation to this policy / activity / event etc?
Any relevant groups that this has been discussed or consulted with. None – statutory policy.

Who is affected by this policy / activity / event etc? What evidence is there to show the impact?
Any relevant groups/ individuals that may be affected by this change / new policy etc • Students who are vulnerable and/or at risk of significant harm to their physical and mental health are positively affected as they will benefit from processes and resources in place so their needs are met within the resources that each academy has. • Parents and carers • Staff need to be aware of and implement the policy

Tick the relevant box for each line	Based on the above information, what impact will this proposal have on the following groups? *see appendix 2 for more details on how each group may be affected, and appendix 3 for possible impacts		
	Positive / Negative / Neutral	Please explain and give examples of any evidence/data used	Action to address negative impact (e.g. adjustment to the policy)
Sex	Neutral		
Gender Reassignment	Positive	➢ Early help for mental health and/or emotional wellbeing, including following government guidance in relation to seeking clinical help and support at the earliest opportunity.	
Age	Positive	➢ Safe environments. ➢ Raised awareness of safeguarding issues. ➢ Clear procedures in place. ➢ Improved information sharing. ➢ Improved record keeping. ➢ Voice of the child heard.	➢ Acknowledgement that safeguarding has particular impact for children and young people. ➢ Staff becoming over sensitive – training and support.
Disability	Positive	➢ Safe environments. ➢ Raised awareness of safeguarding issues. ➢ Clear procedures in place. ➢ Improved information sharing. ➢ Improved record keeping. ➢ Voice of the child heard. ➢ Early help.	
Race & Ethnicity	Positive	➢ Safe environments. ➢ Raised awareness of safeguarding issues. ➢ Clear procedures in place. ➢ Improved information sharing. ➢ Improved record keeping. ➢ Voice of the child heard. ➢ Early help.	➢ Stereotyping (e.g. FGM, HBA, extremist views) - training
Sexual Orientation	Positive	➢ Early help for mental health and/or emotional wellbeing.	
Religion or Belief (or No Belief)	Positive	➢ Safe environments. ➢ Raised awareness of safeguarding issues. ➢ Clear procedures in place. ➢ Improved information sharing. ➢ Improved record keeping. ➢ Voice of the child heard. ➢ Early help.	➢ Stereotyping (e.g. terrorism, extremist views)- training
Pregnancy & Maternity	Positive	➢ If under age then protective measures will be in place.	

| Other Groups: socio-economic exclusion | Positive | ➢ Raised awareness of safeguarding issues.
➢ Clear procedures in place.
➢ Improved information sharing.
➢ Improved record keeping.
➢ Voice of the child heard.
➢ Children's needs are met.
➢ Early help | |

Evaluation:

Question	Explanation / Justification
Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?	No – this policy outlines how schools meet their statutory duties in relation to safeguarding and child protection. The policy fully adheres to the guidance as outlined by Keeping Children Safe in Education (KCSIE) (September 2024) and Working Together to Safeguard Children (2023).

Final Decision:	Tick the relevant box	Include any explanation / justification required
5. No barriers identified, therefore activity will **proceed**.	Yes	
6. You can decide to **stop** the policy or practice at some point because the data shows bias towards one or more groups		
7. You can **adapt** or **change** the policy in a way which you think will eliminate the bias		
8. Barriers and impact identified, however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore, you are going to **proceed with caution** with this policy or practice knowing that it may favour some people less than others, providing justification for this decision		