

Gloucestershire Learning Alliance

Safeguarding Children Policy

Status Statutory <input checked="" type="checkbox"/> Recommended <input type="checkbox"/> Good Practice <input type="checkbox"/>																
Purpose The Gloucestershire Learning Alliance (GLA) is committed to creating, maintaining and promoting a safe environment for all pupils attending any of its constituent Academies and this policy sets out the principles and framework for taking action to bring this about. This policy is informed by and complies with the DfE publications: <ul style="list-style-type: none">• Working together to safeguard children - A guide to inter-agency working to safeguard and promote the welfare of children (2018)• Keeping children safe in education - Statutory guidance for schools and colleges (2018)• The Prevent duty - Departmental advice for schools and childcare providers June 2015• A handbook for Designated Safeguarding (Child Protection) Leads in Educational Settings published by the Gloucestershire Safeguarding Children Board.																
Consultation Governors & Staff, led by Claire Savory, Shirley Clarke, Claire Price and Louise Burridge																
Links with other policies <table><tr><td>Attendance Policy</td><td>Capability Policy</td></tr><tr><td>Behaviour Policy</td><td>Staff Conduct & Safer Working Practices Policy</td></tr><tr><td>Anti-bullying Policy</td><td>Whistle Blowing Policy</td></tr><tr><td>Confidentiality Policy</td><td>The Use of Physical Intervention Policy</td></tr><tr><td>Recruitment Policy</td><td>SEND Policy</td></tr><tr><td>Health & Safety Policy</td><td>Complaint Policy</td></tr><tr><td>Exclusions Policy</td><td>Looked After Children Policy (<i>Worcestershire schools</i>)</td></tr><tr><td>Off Site Visits Policy</td><td>Children in Care (<i>Gloucestershire schools</i>)</td></tr></table>	Attendance Policy	Capability Policy	Behaviour Policy	Staff Conduct & Safer Working Practices Policy	Anti-bullying Policy	Whistle Blowing Policy	Confidentiality Policy	The Use of Physical Intervention Policy	Recruitment Policy	SEND Policy	Health & Safety Policy	Complaint Policy	Exclusions Policy	Looked After Children Policy (<i>Worcestershire schools</i>)	Off Site Visits Policy	Children in Care (<i>Gloucestershire schools</i>)
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The GSCB Handbook: http://www.GSCB.org.uk/CHttpHandler.ashx?id=31580&p=0 WSCB: http://www.worcestershire.gov.uk/info/20377/safeguarding_children																
Monitoring and Evaluation Annually <input checked="" type="checkbox"/> Every 3 years <input type="checkbox"/> Other <input type="checkbox"/> _____ Head of School <input type="checkbox"/> Chair of MAT Board Committee Chair <input type="checkbox"/> Other <input checked="" type="checkbox"/> GLA Safeguarding Group (each DSL, Safeguarding Trustee and nominated Safeguarding Governor)																
Dates Original Implementation: January 2015 Last Reviewed: September 2018 Next Review: September 2019																

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INTRODUCTION

This Policy is the overarching document for safeguarding across the GLA. It sets out the principles and procedures to be adopted by each GLA academy which are then used to produce each academy's **Safeguarding Handbook**.

The policy was drawn up in accordance with, informed by and complies with the following DfE and local publications:

- [Working together to safeguard children](#) - A guide to inter-agency working to safeguard and promote the welfare of children (2018)
- [Keeping children safe in education](#) - Statutory guidance for schools and colleges (2018)
- [The Prevent Duty](#) - Departmental advice for schools and childcare providers June 2015
- [A handbook for Designated Safeguarding \(Child Protection\) Leads in Educational Settings](#) published by the Gloucestershire Safeguarding Children Board.
- Guidance found on WSCB website: http://www.worcestershire.gov.uk/info/20377/safeguarding_children

GLA support fully the principles outlined in the DfE publications listed above.

The purpose of this Safeguarding Policy is to set a clear protocol of action and a framework for our responsibilities and legal duties in relation to each child's welfare. The hope is to ensure a reliable and effective response in the event of any concern for a child's welfare and to support each child and each family.

We hope to encourage children to be confident and assertive. We aim to develop a trusting and respectful relationship with the children in our care, so that they know they will be listened to and believed.

GLA fully recognises its responsibilities for safeguarding children (child protection) and this policy applies to all staff, governors and volunteers working in the school. This policy seeks to set out the actions the GLA will take to protect children and promote the safety and welfare of all pupils in the school.

This policy MUST be read in conjunction with the [GSCB/WSCB Handbook](#) (<http://www.GSCB.org.uk/CHttpHandler.ashx?id=31580&p=0>) / http://www.worcestershire.gov.uk/info/20377/safeguarding_children and school based handbooks:

This policy should be read alongside the Staff Conduct and Safer Working Practices Policy which set out the GLA protocols for staff working with pupils both within the GLA and during activities off-site.

The procedures contained in this policy apply to all staff and governors and are consistent with those of GSCB / WSCB.

This policy can be made available to parents upon request and is published on the GLA website. This policy can be made available in larger print or other accessible format if required.

SAFEGUARDING STATEMENT

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.

Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm and students and staff involved in child protection issues will receive appropriate support.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Welfare of the child is paramount and adults always act in the interests of the child.

Safeguarding is about more than child protection. Child Protection is specifically about protecting children and young people from suspected abuse and neglect. Safeguarding is much wider than child protection. It includes everything an organisation can do to keep children and young people safe, including minimising the risk of harm and accidents and taking action to tackle safety concerns.

AIMS AND PURPOSE OF THE POLICY

The Policy aims to:

- ensure that the GLA develops and implements policies and procedures in accordance with this policy
- ensure that there are robust procedures for identifying and reporting cases, or suspected cases of, abuse
- ensure systems are in place to support students who have been abused in accordance with their agreed child protection plan.
- provide a safe and welcoming environment for all pupils, staff, visitors and parent/carers, regardless of age, gender, ability, race, language, religion, culture, disability or SEND
- provide a safe environment in which pupils can learn and develop
- raise the awareness of all staff through effective communication and training
- set out the relevant responsibilities with clearly identified senior staff to co-ordinate safeguarding and child protection arrangements with specific roles and responsibilities.
- ensure the GLA has effective procedures to identify and deal with any child protection issues which may arise including arrangements for handling allegations of abuse against members of staff, volunteers and the Executive Leadership Team
- Ensure safe recruitment practices in checking the suitability of staff and volunteers who work with students. This includes carrying out the necessary checks on the suitability of people serving on the governing body and ensures that other organisations (who provide staff to the GLA or who will work with students on another site) operate appropriate child protection checks and procedures.

TERMINOLOGY

Safeguarding and promoting the welfare of children refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Child Protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

Child refers to all young people who have not yet reached their 18th birthday.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

Adults at Risk or Vulnerable Adults are also protected against abuse by legislation. They are defined as those aged 18 or over who are, or may be, in need of community care services by reason of mental or other disability, age or illness or who are unable to care for themselves or unable to protect themselves against significant harm or exploitation. This may include adults with learning difficulties, mental health issues, physical impairments or drug or alcohol misuse.

ROLES AND RESPONSIBILITIES

The MAT Board

The MAT Board has overall responsibility for ensuring that the GLA has a child protection policy and procedures in place that are in accordance with statutory guidance and locally agreed inter-agency procedures, and the policy is made available to parents on the school websites.

It must ensure that this policy is fully disseminated across all the constituent Academies and that each Academy implements this policy in full. The Board is responsible for publishing a report on the implementation of this policy on an annual basis.

Designated Safeguarding Leads in each Academy take lead responsibility for dealing with child protection issues, providing advice and support to other staff, liaising with the local authority, and working with other agencies.

The Chief Executive Officer

The CEO has responsibility for coordinating the work of the constituent Academies. S/he shall keep the MAT Board fully informed and also work closely with the Heads of School to ensure the policy is being implemented. Each Academy will be responsible for completing the Local Authority Annual S175 Safeguarding audit (December) publishing the necessary information about the implementation of the policy. This will be moderated by the GLA Safeguarding Group. A copy will be provided to each Local Governing Body, and a summary from the CEO will be reported to the MAT Board. Board members may also have copies of the individual audits on request.

Designated Safeguarding Leads

All schools must nominate a senior member of staff to co-ordinate safeguarding and child protection arrangements; the Designated Safeguarding Lead (DSL). The main responsibility is early identification of students at risk and the correct assessment of their level of need. This allows for appropriate support to be offered quickly and can help to avoid escalation of concerns.

The DSL:

- is appropriately trained
- acts as a source of support and expertise within the GLA community
- has an understanding of GSCB/WSCB procedures
- keeps written records of all concerns, ensuring that such records are stored securely but kept separate from the pupil's general file
- refers cases of suspected abuse to children's social care or police as appropriate
- notifies children's social care if a child with a child protection plan is absent for more than two days without explanation
- ensures that when a pupil with a child protection plan leaves the GLA, their information is passed to their new school and the pupil's social worker is informed
- attends and/or contributes to child protection conferences
- co-ordinates the GLA's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies
- ensures that all staff sign to indicate that they have read and understood the safeguarding policy, parts 1 and 5 of Keeping Children Safe in Education and other relevant safeguarding documents.
- ensures that the Safeguarding and Child Protection Policy is updated annually, ratified by Trustees and published on the GLA website.
- liaises with the nominated governor and Head of School (*where the role is not carried out by the Head of School*) as appropriate
- ensures there is a record of staff attendance at safeguarding training
- Implement actions arising from the annual S175 audit.

The Deputy Designated Safeguarding Lead(s) is appropriately trained and, in the absence of the Designated Lead, carries out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the Designated Lead, the deputy will assume all of the functions above.

The DSL and deputies are named in the individual academy handbooks. The DSL or a deputy is always available to discuss safeguarding concerns. In exceptional circumstances, an arrangement has been made that help may be sought from any MAT DSL in order that there is no delay in taking appropriate action. Staff are aware that they are personally able to make a referral however good practice is to seek advice from a DSL first.

The local authority maintains a list of all designated safeguarding leads (DSLs) for child protection.

Appendix 1: DSL Job Description

The Local Governing Body

Each Academy LGB ensures that the following are in place:

- a DSL for child protection who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training

- a Safeguarding and Child Protection Handbook which links to this overarching policy. These will be published on the relevant academy website with a copy of this policy.
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head of School or member of the Executive Leadership Team.
- safer recruitment procedures that include the requirement for appropriate checks
- a training strategy that ensures all staff, including the CEO, receive safeguarding training, with refresher training at three yearly intervals. The DSL should receive refresher training at two yearly intervals
- all governors will undertake Prevent and FGM training and will read Parts 1 & 5 of Keeping Children Safe in Education 2018.
- The governor nominated for safeguarding will periodically check governor understanding of safeguarding.
- The governor nominated for safeguarding will undergo appropriate training and attend regular updates put on by the Local Safeguarding Children Board.
- arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for safeguarding
- Undertakes the GLA Safeguarding Compliance Checklist for Governors periodically.

The Head of School:

- ensures that the Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff
- allocates sufficient time and resources to enable the DSL and deputy to carry out their roles effectively including the assessment of students and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures
- ensures that they comply with the 'Delegation of Authority' Form issued to children in foster care.
- ensures that pupil's safety and welfare is addressed through the curriculum
- ensures that children are taught about safeguarding, including online safety, as part of a broad and balanced curriculum
- ensures that appropriate filters and monitoring systems are in place, but that "over blocking" does not lead to unreasonable restrictions as to what children can be taught online
- ensures that children will be taught to recognise when they are at risk and how to get help when they need it
- ensures that whenever possible, the school has access to the contact details of two responsible adults for each child.
- ensures that the nominated governor for safeguarding undertakes training appropriate for the role.
- attends DSL Forum meetings and keeps up to date with legislation, disseminating this information as appropriate to all staff and governors.
- works collaboratively with other Heads of School in the sharing of updates.

The Staff:

- all staff, including supply teachers and other visiting staff (e.g. other GLA academy staff, outside agencies) and those supporting educational visits, will be informed of the Designated Safeguarding Lead's name and the GLA policy for the protection of children:
 - during their first induction to the GLA
 - through the staff handbook
 - through whole staff training or briefing meetings
- all staff need to be alert to the signs of harm and abuse. They should report any concerns if not immediately, as soon as possible, to the Designated Lead or named deputy. If in any doubt staff should consult with the Designated Lead.
- retain personal responsibility for concerns raised; satisfying themselves that the process is being followed and following up as necessary
- all staff will be made aware of the risks to online safety and training on this will be integrated as part of the overarching safeguarding approach
- all staff must follow the procedures laid down in this policy and the protocols laid down in the Staff Conduct and Safer Working Practices Policy.
- all relevant national and local procedures will be made available for staff reference

Safer Recruitment

The GLA endeavors to ensure that we do our utmost to employ 'safe' staff by following the guidance in Safeguarding Children and Safer Recruitment in Education (pp20-54) and Part 3 of Keeping Children Safe in Education 2018 together with the GSCB/WSCB procedures. The GLA will ensure that each appointment panel has at least one member trained in safe recruitment techniques according to current government guidance.

- all applicants will be vetted. Applicants' personal details set out on the application form will be verified, and qualifications checked.
- all the necessary safer recruitment checks (Including DBS checks and a Prohibition from Teaching check) are carried out on all appointees including supply staff, volunteers and those that serve on the governing body)

Safer recruitment means that all applicants will:

- complete an application form prior to interview. Any gaps in employment will be investigated prior to interview.
- provide two referees, including at least one who can comment on the applicant's suitability to work with children. In the case of internal candidates, one reference will be sufficient however this must be provided by a senior person with appropriate authority. References will be checked to ensure that they are from a legitimate source.
- References must be written and should be checked following guidance in KCSIE 2018 (para 139 – 142) and provide evidence of identity and qualifications
- be checked through the DBS as appropriate to their role and be registered with the Independent Safeguarding Authority (from 2010 onwards)
- be interviewed.

All new members of staff will undergo an induction that includes

- Being informed of the identity of the DSL and any deputies.
- reading Parts 1 & 5 of Keeping Children Safe in Education 2018, the GLA and individual school safeguarding policy and handbook. Staff must sign to say that they have received, read and understood these.
- training on the online recording system
- Being given a copy of the following policies in line with KCSiE 2018: behaviour policy, staff behaviour policy, children missing from education.
- All new staff must complete the online Gloucestershire Safeguarding Board (GSCB) training (or the Worcestershire Safeguarding Board equivalent) before starting their role.
- identification of their child protection training needs.

Extended school and off-site arrangements

Where extended school activities are provided by and managed by the school, our own Safeguarding and Child Protection Policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, we will check that effective safeguarding arrangements are in place.

IDENTIFYING AND REPORTING CASES

Recognising abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children (Working Together 2018)

The GLA is also mindful of contextual safeguarding. As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms

and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Assessments of children in these cases will consider whether wider environmental factors are present in a child's life and are a threat to their safety and/or welfare. Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare. Interventions will focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to local authority children's social care. Assessments of children in these cases will consider the individual needs and vulnerabilities of each child looking at the parental capacity to support the child, including helping the parents and carers to understand any risks and support them to keep children safe and assess potential risk to child.

Each academy has produced an Early Offer of Help using the Levels of Intervention guidance produced by GSCB and WSCB. These are published on each academy website.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.

Physical abuse

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

Emotional abuse

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

Sexual abuse

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

Neglect

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

Definitions taken from *Working Together to Safeguard Children* (HM Government, 2018).

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to 12 child suicides each year.

All incidences of bullying should be reported and will be managed through our anti - bullying procedures. The subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti- bullying procedures are deemed to be ineffective, the Head of School and the DSL will consider implementing child protection procedures.

Peer on Peer Abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the GLA's anti- bullying procedures where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than Anti- bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18. GLA staff will consider the wider context within which such incidents /behaviour occur, bearing in mind factors outside the GLA.

The management of children and young people with sexually harmful behaviour is complex and the GLA will work with other relevant agencies to maintain the safety of the whole community.

It is recognised that some children who have experienced abuse may in turn abuse others. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. This requires a considered, sensitive approach in order that the child can receive appropriate help and support.

We will endeavour to support students through our: Pastoral System, PSHE programme and Behaviour Management Policy, including Anti- Bullying. In dealing with incidents involving significant peer on peer abuse, staff will follow the guidance in KCSiE 2018 Part 5.

Child Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Working Together to Safeguard Children 2018)

What marks out exploitation is an imbalance of power in the relationship. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

All suspected cases will be referred by DSL to Gloucestershire /Worcestershire Child Sexual Exploitation Team for support in using the [GSCB screening tool](#) (or WSCB equivalent) and any subsequent investigation.

Indicators of abuse – what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

It is staff responsibility to report concerns, but not to investigate or decide whether a child has been abused.

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits

- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become uninterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol or
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well-buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties. The GLA recognises the impact of Adverse Childhood Experiences (ACEs) on these children and works to minimise this through working with outside agencies.

Taking action

Key points to remember for taking action are:

- in an emergency, staff should take the action necessary to help the child, for example, call 999
- report concern to the DSL as soon as possible and in any event by the end of the day.
- update records on the relevant online system (Behaviour Watch / CPOMS) and do not start an investigation until directed by the DSL.
- do not start an investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern
- seek support if distressed.

If you suspect a student is at risk of harm

There will be occasions when staff suspect that a child may be at risk, but without any 'real' evidence. In these circumstances, staff should try to give the child the opportunity to talk. The signs noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine to ask the child if they are OK or if they can be helped in any way.

Staff should log their cause for concern on the relevant platform (Behaviour Watch / CPOMS) to record these early concerns and discuss the concern with the Designated Safeguarding Lead at the earliest opportunity. If the student does begin to reveal that they are being harmed you should follow the advice in the section 'If a student discloses to you'. Having logged the cause for concern and spoken to the DSL, staff should check with the DSL what actions have been taken and challenge any decision if it is felt that the action taken is inappropriate. This may include bringing it to the attention of a partner DSL.

If, following your conversation, you remain concerned, you should discuss your concerns with the Designated Safeguarding Lead at the earliest opportunity.

If a student discloses to staff

If a child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child sensitively that he/she has a responsibility to refer the matter to the designated teacher for the child's own sake. At the same time, the pupil should be reassured that the matter will be disclosed only to the DSL, who will then decide on appropriate action.

Staff should immediately contact the DSL whenever a disclosure is made.

During the conversation with the child staff should:

- allow them to speak freely
- remain calm and not over-react – the child may stop talking if they feel they are causing upset
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’,
- ‘this isn’t your fault’, ‘You are doing the right thing in talking to me.’
- do not be afraid of silences – remember how hard this must be for the child.
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child’s mother think about all this.
- at an appropriate time tell the child that in order to help them you must pass the information on.
- avoid automatically offering any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- tell the child what will happen next. The student may agree to go with you to see the Designated Safeguarding Lead. Otherwise let them know that someone will come to see them before the end of the day.
- Report verbally to the Designated Safeguarding Lead.
- Write up the conversation as soon as possible by logging a cause for concern on the relevant platform and see the DSL. If the DSL is not available in person, they must be contacted by telephone.
- Seek support from the DSL if distressed.

Notifying parents

The GLA will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children’s social care.

Working with Parents/Carers

Parents play an important role in protecting their children from abuse. The GLA is required to consider the safety of the pupil and should a concern arise the DSL has the responsibility to seek advice prior to contacting parents/carers.

The GLA will work with parents/carers to support the needs of their child.

The GLA aims to help parents/carers understand that the GLA has a responsibility for the welfare of all students and has a duty to refer cases to the appropriate Local Authority department in the interests of the child.

Referral to children’s social care

The DSL will make contact with the Front Door for guidance. The DSL will make a referral to children’s social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. The MASH team will make contact with the school to gain information.

Operation Encompass

From January 2019, the GSCB will introduce Operation Encompass. A member of the police will contact the DSL first thing on the morning following a domestic violence incident. This will increase awareness of issues the child has faced when out of school and enable the school to support them appropriately. Staff are currently undergoing training for the introduction of this service.

Case conferences and core group meetings

The GLA has a commitment to attendance at inter-agency child protection/safeguarding meetings.

A member of staff may be required to attend a Child Protection/Safeguarding case conference. The member of staff should prepare a report to present to the Case Conference chair at the start of the meeting, who will gather all information and assess the risks.

If a child's name is placed on the local Child Protection Register, a Core Group will be agreed in accordance with the Local Authority procedures. All Core Group members meet regularly (at least monthly) to monitor and progress the Child Protection Plan and Core Assessment. The GLA will give priority to attendance at these meetings.

Confidentiality and Sharing Information (see also the Confidentiality Statement in each staff handbook)

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that release into the public domain does not compromise evidence.

Staff should only discuss concerns with the Designated Lead or Head of School. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The General Data Protection Regulations (GDPR) and the Data Protection Act 2018 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 utmost importance to us. GDPR does not 'trump' safeguarding. Processing safeguarding data is necessary for compliance with our legal obligation to which OCL is a subject. Therefore consent is not needed for the effective sharing of safeguarding information between an academy and relevant authorities.

Child protection information will be stored and handled in line with the General Data Protection Regulation 2018 (GDPR) principles. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights and
- secure.

Causes for concern are logged on the relevant platform (Behaviour Watch /CPOMS) and any other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of GDPR which means that pupils and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the Head of School. GDPR does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy.

However, they may also share information directly with children's social care, police or the NSPCC if the situation is an emergency and the DSL, their deputy, the Head of School and the Chair of governors are all unavailable and they are convinced that a direct report is the only way to ensure the student's safety.

The DSL and deputies are named in the individual academy handbooks. The DSL or a deputy is always available to discuss safeguarding concerns. In exceptional circumstances, an arrangement has been made that help may be sought from any MAT DSL in order that there is no delay in taking appropriate action. Staff are aware that they are personally able to make a referral however good practice is to seek advice from a DSL first.

Support for those involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support pupils, their families and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person who will keep all parties informed and be the central point of contact. Where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of helplines, counselling or other avenues of external support
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures
- co-operating fully with relevant statutory agencies.

Support for Staff

Receiving a disclosure or observing signs of abuse can be very distressing. All staff should discuss their feelings with the Designated Safeguarding Lead or other senior member of staff.

Members of staff may be asked to attend a safeguarding student case conference for which they should provide a report. Staff involved will be helped by the DSL to provide relevant information.

Any member of staff who is concerned about involvement in safeguarding pupil issues can discuss the matter with the Head of School.

ALLEGATIONS AGAINST STAFF

Complaints Procedure

Our complaints procedure will be followed where a child or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a child, using sarcasm or humiliation as a form of control, bullying or belittling a child or discriminating against them in some way. Complaints are managed by senior staff, the Head of School and governors. The Complaints Policy is available on the website.

Reasons for Allegations

The procedure below is followed when staff or volunteers have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student
- Possibly committed a criminal offence against or related to a student
- Behaved towards a student in a way that indicates that he or she would pose a risk of harm if he or she worked regularly or closely with children.

All staff, governors and volunteers have a responsibility to familiarise themselves with this procedure so that they can understand what to do if they receive an allegation against a member of staff or have concerns about the behaviour of a member of staff.

Appendix 2 [Gloucestershire Allegations Management Flowchart](#) / guidance for schools covered by WSCB can be found [here](#)

What to do if you have concerns about a colleague

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The GLA Whistleblowing Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. All concerns of poor practice or possible child abuse by colleagues should be reported as follows:

Whistleblowing

The GLA's whistleblowing policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

Procedure

Procedure for managing allegations against staff (including volunteers, the Head of School and members of the Executive Leadership Team)

An allegation made against teachers and other staff (including volunteers who work with students) must be reported immediately. Should the initial allegation first be made to any other member of staff then that member of staff must either request the person raising the allegation to report it to the appropriate person* or if that is not possible, to pass details of the allegation immediately.

*Who is the *appropriate person* to receive the referral?

Allegation concerns:	Refer to:
Member of staff or volunteer	Refer to the Head of School
Head of School	Refer to the Executive Headteacher, without first referring to the Head of School
Executive Headteacher	Refer to the CEO, without first referring to the Executive Headteacher
CEO	Refer to the GLA Chair, without first referring to the CEO

The LADO will be informed of all allegations which appear to meet the above criteria.

The appropriate person* will discuss the matter with the LADO and where necessary, the LADO will obtain further details of the allegation and the circumstances in which the allegation was made. The GLA will act in accordance with advice given by the LADO and will not investigate allegations or inform any individuals without the LADO's consent. The GLA follows the approach set out in the Summary of Allegations Management flow diagram issued by GSCB.

The GLA may take action in the event of allegations against staff in accordance with its disciplinary procedures. If the member of staff (including a volunteer or governor) is deemed unsuitable to work with children and the GLA ceases to use their services, the GLA will make a detailed and prompt report to the Disclosure and Barring Service within one month of the member of staff, volunteer or governor leaving the GLA.

GSCB/WSCB Guidance

The GLA will adopt the Local Authority Code of Conduct for GLA staff accused of child abuse. All staff will adhere to this code of conduct and the Department for Education guidance 'Dealing with Allegations of Abuse against Teacher and other Staff'. (See Gloucestershire Safeguarding Children Board Safeguarding Children handbook at www.GSCB.org.uk for further details).

Confidentiality

The GLA will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. The GLA will liaise with the Local Authority Designated Officer (LADO), police and social care services as to managing confidentiality as appropriate.

Staff who are the subject of an allegation

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Suspension

Suspension will not be an automatic response to an allegation but will be considered where the circumstances warrant it, including:

- there is cause to suspect a child or other children at the GLA is or are at risk of significant harm
- the allegation warrants investigation by the police
- the allegation is so serious that it might be grounds for dismissal
- it is necessary to progress the investigation.

If suspension is deemed appropriate, the reasons and justifications will be recorded by the GLA and the individual will be notified of the reasons usually within one working day.

Duty of Care

The GLA recognises that it has a duty of care towards its employees and will ensure support is in place for individuals facing an allegation. Individuals should be informed of concerns or allegations and given an explanation of the likely course of action as soon as possible, unless external agencies object to this. A representative will be appointed by the GLA to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.

Record keeping

The GLA will keep a clear and comprehensive record of any allegation made, the action taken and decisions reached. The GLA will provide the accused person with a copy of the record following consultation with the appropriate agencies and once agreement has been reached as to what information can be disclosed. The record will be kept confidentially on the personnel file.

Malicious or unfounded allegations

The Head of School will consider whether to take action in accordance with the GLA's behaviour policy where an allegation by a child is shown to be malicious or deliberately invented.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in references.

Timescales

It is in everyone's interest for cases to be resolved as quickly as possible consistent with a fair and thorough investigation.

Listening to Students

The GLA recognises the importance of listening to pupils at all times, particularly when they are distressed, worried or concerned. It is appreciated that at times children may feel stressed and confused. The GLA will identify quiet areas and provide the opportunity for pupils to take respite from the normal day when necessary.

All staff will be made aware that pupils who are not known to be the subjects of concern may, however, be experiencing ill treatment, neglect or abuse. This means that staff should be aware of the need for sensitivity when dealing with pupils at all times. Staff who hear concerns from pupils must listen carefully and avoid asking leading questions.

The GLA recognises that children who are distressed through experiences outside the classroom may be less able to achieve their potential. While it is clear that such students need firm boundaries, staff will take into account a child's distress when managing behaviour.

ADDITIONAL RISK AREAS

Children who may be particularly vulnerable

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur. For example,

Staff will be alert to the possibility that students with SEN needs whose behaviour is being monitored could have safeguarding concerns as well as their Special Educational Need.

To ensure that all students receive equal protection, we will give special consideration to children who are:

- looked after children
- disabled or has specific additional needs
- special educational needs (with or without a statutory Educational Health and Care Plan)
- is a young carer
- living in a domestic abuse situation
- affected by parental substance misuse, or their own
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- living transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- involved directly or indirectly in prostitution or child trafficking
- do not have English as a first language.
- with a parent in prison or returning from prison (useful [GSCB Guidance here](#))

Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats when possible. Families will be offered Early Help where appropriate.

Forced Marriages

The Government's guidelines define forced marriage in the following terms:

*'Forced marriage is a form of child/domestic abuse and violence against women'.
[Multi-agency practice guidelines: Handling Cases of Forced Marriage (2009)]*

Forced marriage is very distinct from arranged marriage:

'In arranged marriages, the families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the prospective spouses. However, in forced marriage, one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In the cases of some vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be forced.' *[The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage (2014)]*

Whilst each individual case of forced marriage and attempted forced marriage is often very particular, cases are likely to share a number of common and important characteristics, including:

- an extended absence from school, including truancy;
- a drop in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and students being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse;
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.
- evidence of honour-based violence.

On their own, these characteristics may not indicate forced marriage. However, it is important for the school to be satisfied that where these behaviours occur, they are not linked to forced marriage. If teachers have suspicions or are concerned that a student may be about to be forced into marriage or may be a victim of forced marriage, they should inform the DSL as soon as possible. Normal Child Protection procedures will be followed.

Female Genital Mutilation

Female Genital Mutilation has been illegal in the UK since 1985, but legislation in 2003 in England, Wales and Northern Ireland, and in 2005 in Scotland, also made it an offence to force a child to undergo Female Genital Mutilation abroad.

Suspensions may arise in a number of ways that a child is being prepared for Female Genital Mutilation to take place abroad. These include knowing that the family belongs to a community in which Female Genital Mutilation is practiced and is making preparations for the child to take a holiday or planning absence from school. The child may also talk about a 'special procedure/ceremony' that is going to take place. Indicators that Female Genital Mutilation may already have occurred include prolonged absence from school, with noticeable behaviour change on return and long periods away from classes or other normal activities, possibly with bladder or menstrual problems. Some may find it difficult to sit still and look uncomfortable or may complain of pain between their legs or talk of something somebody did to them that they are not allowed to talk about.

Female Genital Mutilation is a form of child abuse. Normal Child Protection procedures will be followed if GLA staff suspect a case of Female Genital Mutilation.

All front office staff are aware of the indicators for FGM and all DSLs and Attendance Officers have undergone training. Staff who discover through disclosure that an act of FGM appears to have taken place on a girl under the age of 18 have a mandatory duty to report this to the police. If the teacher has a good reason not to report it immediately, they must discuss the case with the DSL and social care must be involved as appropriate.

Looked After Children / Children in Care

Keeping Children Safe in Education 2018 reinforces the need for a named member of staff to retain overall responsibility for the education of children who are or have been looked after. Sue Gifkins has this responsibility across the GLA and works closely with members of staff and the Virtual School.

Private Fostering

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

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

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

Academies have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although academies have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the GLA. However, it should be clear to the GLA who has parental responsibility.

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

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

The Prevent Duty

All GLA staff have completed Prevent training and it is revisited annually. The duty to actively promote Fundamental British Values has been live from 1st July 2015. This was first set out by the government in the 'Prevent' Strategy in 2011.

The Counter Terrorism and Security Act 2015 has introduced the Prevent Duty for various bodies including all FE colleges, adult education providers and independent learning providers with SFA funding or with over 250 students enrolled.

The Prevent Duty has "due regard to the need to prevent people from being drawn into terrorism" Anti-Terrorism and Security Act 2015: Schedule 3, Section 21.

What is our responsibility?

To assess the risks of people being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.

All staff to actively promote British values.

Raise awareness of the Prevent duty and British values to all staff and learners.

Establish a reporting procedure for all concerns relating to people being drawn into terrorism.

What is Extremism?

Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).

What is radicalisation?

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups.

What are British Values?

British Values are defined as "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"; institutions are expected to encourage students to respect other people with particular regard to the protected characteristics set out in the The Equality Act 2010.

Vulnerability / risk indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people / young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. The following factors may increase an individual's vulnerability:

Identity crisis – Being distanced from cultural and or religious heritage and uncomfortable with their place in the society around them.

Personal crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.

Personal circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

Unmet aspirations – Perceptions of injustice; feelings of failure; rejection of civic life.

Criminality – Experiences of imprisonment; poor resettlement / reintegration, previous involvement with criminal groups.

Procedures for reporting concerns

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the person supports terrorism and/or extremism, must be reported to the named Designated Safeguarding Lead immediately and no later than the end of the working day. (Same procedure as Safeguarding)

Key contact details

GLA Designated Safeguarding Lead

Home Office helpline. Open Monday to Friday from 9am to 6pm (excluding bank holidays).
Email: counter.extremism@education.gsi.gov.uk Telephone 020 7340 7264

Police: Telephone 101 (999 in emergency)

For support, training or advice contact Gloucestershire PREVENT Partnership Board Coordinator Jayne Putland (Tel: 01452 888766 Email: jayne.putland@glosfire.gov.uk)

Anti-terrorist hotline: 0800 789 321

Crimestoppers: 0800 555 111

<https://www.gov.uk/report-terrorism>

Students absent from school without reason

Occasionally students may 'go missing' for a variety of reasons. The GLA will use the following procedures:

Registers are taken at the start of each session

The school office will check the registers to establish if the child has been registered that day, and whether he/she has been reported sick

The GLA Office will check if parents/carers know the child's whereabouts

The school will then follow the following protocol in Appendix 3

Child Missing from Education

A child going missing from education is a potential indicator of abuse or neglect. Staff will follow the GLA procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in the future.

The GLA will inform the local authority of any pupil who is going to be deleted from the admission register where they:

- Have been taken out by their parents and are being educated outside of the school system eg. Home education
- Have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- Have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age or
- have been permanently excluded.

The local authority will be notified when a pupil is deleted from the GLA's register under the above circumstances. This should be done as soon as the grounds for deletion are met, but no later than on deleting the pupil's name from the register.

The GLA will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed intervals determined by the Secretary of State.

Action to be taken when a student transfers to another school/GLA

In the event of a pupil, who is being dealt with under the GLA's child protection procedures, transferring to another school, the GLA will:

- Find out the name of the receiving school (and, where appropriate the local authority)

- Contact the relevant member of staff at that school to discuss the transfer
- Send all information (including the child protection file) relating to the student to the receiving school as soon as possible (and where relevant the local authority) and obtain written confirmation of receipt.
- Check with the receiving school that the student has actually arrived there on the expected day
- Inform all relevant agencies of the transfer.

Training

The GLA has a commitment to training and attendance at inter-agency child protection/safeguarding meetings. Time will be given to enable this commitment to be met

The DSL will receive relevant training at least every two years in child protection and inter-agency working

All staff (full or part-time, permanent or temporary and voluntary) and the Principal will receive relevant training and up-dating at least every three years

All new members of staff (including volunteers) will undergo an induction that includes familiarisation with the GLA's Safeguarding and Child Protection Policy and identification of their child protection training needs

All safeguarding governors will undertake training appropriate to the role

Training will be organised by the DSL following a programme drawn up by the Head of School in consultation with the DSL, and agreed by the governing body

The DSL will be expected to cascade learning to the wider staff group via meetings and any other appropriate methods.

Equal Opportunities

The Governing Body, Head of School and staff will take into account the GLA's equal opportunities policies when discharging their duties under this policy.

Monitoring and Review

The DSL will liaise regularly with the GLA Safeguarding Group (consisting of each DSL, Safeguarding Trustee and nominated safeguarding governor) and will monitor the working of the policy and will report as required to the MAT board and Local Governing Bodies.

The annual S175 audit will be completed by each academy and submitted to the local authority in line with GSCB/WSCB requirements. This audit will typically be carried out during a meeting of the GLA Safeguarding Group.

The CEO will report to the MAT Board annually on the working of the policy.

The GLA Safeguarding Group will undertake an annual review of the GLA's Safeguarding and Child Protection Policy and procedures and the efficiency with which the GLA's duties have been discharged. In the event that any deficiencies or weaknesses are identified these will be remedied without delay.

Date of next review

September 2019

Signed: _____
(Chair)

Date: _____

JOB DESCRIPTION – DESIGNATED SAFEGUARDING LEAD

The Designated Safeguarding Lead (DSL) must be an appropriate senior member of staff, from the school or college leadership team. They have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies. The Designated Safeguarding Lead need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post.

Job Title: Designated Safeguarding Lead

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

The designated safeguarding lead is expected to:

- liaise with the Headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school or college's child protection policies are known, understood and used appropriately;
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the local LSCB to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection file

Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

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

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.



Concern about a member of staff or a volunteer working with children

Appendix 2 – Gloucestershire Allegations Management Flowchart

If a professional receives an allegation or has a concern about the behaviour of a member of staff working or volunteering with children and that concern could amount to:

- a. a member of staff or volunteer has behaved in a way that has harmed a child, or may have harmed a child, or
- b. possibly committed a criminal offence against or related to a child, or
- c. behaved towards a child or children in a way that indicates s/he may pose a risk of harm to children.

Then that professional should:

Report their concerns

Report the concern to the most senior person not implicated in the allegation.

Completion of written record

Complete a written record of the nature and circumstances surrounding the concern, including any previous concerns help. Include where the concern came from and brief details only.

Seek advice before proceeding – Initial Discussion

Always contact the Local Authority Designated Officer (LADO) for advice prior to investigating the allegation. This is because it might meet the criminal threshold and so your investigation could interfere with a Police or Social Care investigation.

Local Authority Designated Officer (LADO) – Tel: 01452 426994

The LADO will offer advice on any immediate action required and will assist with employment and safeguarding issues.

Allegations Management Process

If, after your Initial Discussion with the LADO, it is agreed that the allegation meets the criteria, a multi-agency meeting will be convened and you will be invited. This might result in a criminal investigation, a Social Care investigation and/or an investigation to inform whether disciplinary action is required.

If it is agreed that the allegation does not meet the criteria, the LADO will record the Initial Discussion and send it to you for your records. Any further action will be taken within your setting if necessary.

Further action

Further meetings might be required and these will be convened by the LADO, with your input at all times. Further information on the Allegations Management process can be found

January 2017

Appendix 3 – Children Absent From School Protocol

Attendance and Absence

Attendance Expectation
 It is the expectation of the school that all children will attend school 100% of the time. However, children with an absence record of below 90% will not be authorised any absence unless medical evidence or extenuating circumstances are otherwise proven.

Pupil's with Attendance below 90%
 1. If attendance falls below 90%, without a authorised and valid reason, HoS writes a letter to inform the parents.
 2. Attendance Team to monitor individual attendance over a four week period.
 3. If the attendance continues to be below 90% an AIM is arranged.
 4. If, following a four week period, attendance continues to be below 90%, a penalty notice will be issued.

Children Missing in Education
 Children with five days of continuous, unauthorised absence will be reported as missing in Education. The child will stay on role until confirmation has been received that they are enrolled in a new setting.

DAY ONE
 If the parents haven't made contact with school before 10am send a text. To be followed up with a phone call to both contacts if no response to text. No contact: unauthorised

DAY TWO
 If the parent fails to contact the school again by 10am, complete a welfare check. To be followed up with a phone call to both contacts if no response to text. No contact: unauthorised

DAY THREE
 As day two, If the parent fails to contact the school again by 10am, send another text and attempt to make telephone contact. No contact: unauthorised

DAY FOUR
 Hand deliver welfare letter with another member of staff. No contact: unauthorised

DAY FIVE
 Contact the Education and Inclusion Team and report as missing in education. Seek EHT/HoS advice as to whether to issue a penalty notice.

REWARDS
 Children with attendance above 90% with less than 3 lates in a twelve week period will receive a reward. Those with no lates and/or 100% attendance will be celebrated in assembly.

Lateness
 1. Pupils who are late more than 5 times in a four week period will be sent a letter home.
 2. Lateness will be monitored for a further four weeks.
 3. If lateness continues to be an issue, an AIM meeting will be held.

Contact Numbers
 All children to have a minimum of 2 different contact numbers. Both numbers to be attempted in the case of absence.

Education & Welfare Teams
 Gloucestershire:
 Saima Koko
 Karen Thompson
 01452 328704
 Worcestershire:

Appendix 4 – Glossary of Terms

ACE	Adverse Childhood Experience
CEO	Chief Executive Officer
CPOMS	Child Protection Online Monitoring System
DfE	Department for Education
DSL / DDSL	Designated Safeguarding Lead / Deputy Designated Safeguarding Lead
FGM	Female Genital Mutilation

GDPR	General Data Protection Regulations
GLA	Gloucestershire Learning Alliance
GSCB	Gloucestershire Safeguarding Children Board
KCSiE 2018	Keeping Children Safe in Education 2018
LA	Local Authority
LAC	Looked After Children (official terminology for all children in LA care however Gloucestershire use the term Children in Care)
LADO	Local Authority Designated Officer
MASH	Multi Agency Safeguarding Hub
MAT Board	Multi Academy Trust Board
SEND	Special Educational Needs & Disability
WSCB	Worcestershire Safeguarding Children Board