



ATTEND – ENGAGE - PROGRESS

‘Reality Strikes Academy provides alternative education that combines academic learning with football coaching to help young people reengage with education, through a trauma informed, nurturing environment. The vision is to foster holistic personal and emotional growth to create positive pathways into the future for young people.’

REALITY STRIKES ACADEMY

Safeguarding, Child Protection Policy and Procedure

2025/26

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Important Contacts

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Tyrone Perry-Harry Head Teacher	07720 428 965 Tyrone.perry-harry@compass-schools.org
Deputy Designated Safeguarding Lead 1 (DDSL)	Mercedes Dare Deputy Head Teacher	Mercedes.dare@compass-schools.org 07955 400 323
Deputy Director of Education Services	Kit Hobbs	Kit.Hobbs@CompassCommunity.co.uk 07720 428 952
Senior Director of Education Services	Rebecca Slayford	Rebecca.slayford@compasscommunity.co.uk 07753 584 581
Chair of Governors	Kate East	Kate.East@compasscommunity.co.uk 07766 110 653
Governor for Safeguarding and Quality Assurance	Stephanie Clay	Stephanie.Clay@compasscommunity.co.uk 07971 771 165
Channel Helpline	NA	020 7340 7264
Local Authority PREVENT Contact	Wiltshire County Council	PreventReferrals@wiltshire.police.uk
Compass Community Head of Group IT	Alastair Ogden	HelpDesk@CompassCommunity.co.uk Alastair.Ogden@CompassCommunity.co.uk 01903 947 2920
Regional SENCO	Sarah Smith	sarah.smith01@compass-schools.org

1. Our Commitment

Our school is committed to safeguarding all children and young people, and we expect everyone who works with us to share this commitment, including proprietors, governors and visitors.

Adults in our school take all welfare concerns seriously. We encourage, and provide a variety of opportunities for, children and young people to talk to trusted adults about anything that worries them.

All staff are aware that children are sometimes not ready or willing to share that they are being abused, exploited or neglected, and that they may not recognise their experiences as harmful.

This does not prevent staff from maintaining professional curiosity and speaking to the Designated Safeguarding Lead (DSL) if they have any concerns about a child.

We have an established culture of vigilance to protect children from harm. The school assesses the risks, circumstances and issues in the wider community when considering the well-being and safety of its pupils.

All pupils are taught about safeguarding, including online, as part of a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

We will always act in the best interest of the child, and pupils remain at the centre of our thinking and decision making, regardless of the circumstances.

2. Aims

The school, and this policy, aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

3. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2025\)](#) and [Working Together to Safeguard Children \(2023\)](#).

Although we are an Independent Special School, this policy is also based on non-statutory guidance from the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#).

This policy also has a basis in:

- [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers May 2024](#)
- [What to do if you are worried a child is being abused: advice for practitioners March 2015](#)
- [Controlling or Coercive Behaviour: statutory guidance framework July 2023](#)

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see **3.Definitions** below).

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children

4. Definitions

Safeguarding and promoting the welfare of children means:

- 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
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

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

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

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Children includes everyone under the age of 18.

The following 3 **Safeguarding Partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)

- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

5. Equality Statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see **Pupils with special educational needs, disabilities or health issues**)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see **Looked-after and previously looked-after children**)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

6. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, governors, visitors and providers in, and working with, the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This is underpinned by our:

- Behaviour policy
- Curriculum policy
- Therapeutic approach and environment
- Planned programme of relationships, sex and health education (RSHE) and personal, social, health and economic education (PSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - 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 FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

6.1 All Staff

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance

- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this **Safeguarding and Child Protection Policy**, the staff **Code of Conduct**, the role and identity of the **designated safeguarding lead (DSL)** and their **deputy designated safeguarding leads (DDSL)**, the **Behaviour for Learning Policy**, the **Online Safety Policy** and the safeguarding response to children missing from education as detailed in the **Attendance and Registration Policy**.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children
- That a child and their family may be experiencing multiple needs at the same time
- What to look for to identify children who need help or protection

(See **Training** and **Specific Safeguarding Issues** below, outlining in more detail how staff are supported to do this).

6.2 The designated safeguarding lead (DSL) and their deputies (DDSLs)

The DSL is a member of the senior leadership team. Their details are outlined in **Important Contacts**, above. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online, as supported by the **Head of Group IT**, and their team.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Outside of term time, details of who to contact if necessary, will be detailed in automatic email replies, and school telephone answerphone messages. These will usually be the safeguarding colleagues outlined in **Important Contacts**, above.

When the DSL is absent, the DDSLs will act as cover. Their details are outlined in **Important Contacts**, above.

If the DSL and DDSLs are not available, appropriate members of the Executive Leadership Team (Executive Headteachers) or Directorship (Regional, Deputy or Senior Directors) will act as cover (for example, during out-of-hours/out-of-term activities). Their details are outlined in **Important Contacts**, above.

The DSL will be given the time, funding, training, resources and support to:

- Ensure that all members of the school community know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- 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
- Have a good understanding of harmful sexual behaviour (HSB) and problematic sexual behaviour (PSB)
- Have a good understanding of the filtering and monitoring systems and processes in place at our school
- Make sure that staff have appropriate Prevent training and induction

The DSL will also:

- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL and their DDSs are set out in their job descriptions.

6.3 The Governors and The Proprietary Board

The Senior Director of Education Services, Regional Director and Executive Headteacher (where applicable) will ensure that the policies and procedures adopted by the governing body are fully implemented and that sufficient resources and time are allocated to enable staff members and school leaders to discharge their safeguarding responsibilities.

The governors and the proprietary board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteachers, executive leadership teams and regional directors to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- The school has a nominated governor responsible for safeguarding and their details are outlined in **Important Contacts**, above. They will champion good practice, provide critical challenge, liaise with the head teacher and provide information and reports to the governing body. They will also monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). (See **Allegations of Abuse made against staff** below).
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and ensure that they are inspected/quality assured as needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Where the school is supported by an Executive Headteacher, they will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

Where the school is not supported by an Executive Headteacher, the regional director will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate.

The regional director will act as the 'case manager' in the event that an allegation of abuse is made against the executive headteacher, where appropriate.

The chair of governors, or an appropriately independent and trained professional delegated by the chair of the proprietary board, will act as the 'case manager' in the event that an allegation of abuse is made against the Regional Director, where appropriate.

The chair of the proprietary body, or an appropriately independent and trained professional delegated by them, will act as the 'case manager' in the event that an allegation of abuse is made against the Senior Director for Education Services, where appropriate.

(See **Allegations of Abuse made against staff** below).

All governors will read Keeping Children Safe in Education in its entirety.

(See **Training** below, outlining in more detail how governors and the proprietary board are supported to do this).

6.4 The Headteacher

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- (Where they are not the DSL) ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- (Where they are the DSL) ensuring that they protect the appropriate time, funding, training and resources to fulfil their role as the DSL, and that there is always adequate cover if they are absent
- Ensuring that the DDSs have appropriate time, funding, training and resources, and that there is always adequate cover if any are absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (See **Allegations of Abuse made against staff** below)
- Making decisions regarding all low-level concerns, in collaboration with the DSL (where they do not fulfil this role) and the Regional Director
- Ensuring the relevant staffing ratios are met, where applicable

6.5 Virtual School Heads and Designated Teachers for Children Looked-After (DT for CLA)

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others. Their details are outlined in **Pupil Admissions Register**.

The nature of our school's cohort is such that we engage with multiple Local Authority teams and, by extension, multiple Virtual School Heads from different Local Authorities.

The school has appointed a Designated Teacher for Children Looked-After (DT for CLA) who is responsible for promoting the educational achievement of children who are looked after or who have a social worker. They will be the key point of contact and work with the Virtual School

headteacher to discuss how best to support the progress of looked after children and meet the needs identified in the child's personal education plan, as well as supporting the school to discharge its safeguarding duties effectively and without drift or delay. Their details are outlined in **Important Contacts**, above.

7. Confidentiality

Our full approach to confidentiality and data protection is detailed in the **Data Retention Policy**.

Specifically with regards to this policy, the school notes that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and the UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if:
 - it is not possible to gain consent;
 - it cannot be reasonably expected that a practitioner gains consent;
 - or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as it is highly unlikely for this to ever be in the child's best interests
- If a victim asks the school not to tell anyone about incidences or disclosures regarding **sexual violence or sexual harassment**:
 - There is no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: ***if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care***
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the

alleged perpetrator is under 10, the starting principle of referring to the police remains

- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy), Executive Headteacher or Regional Director

Confidentiality is also addressed in this policy with respect to **Record-Keeping** (below), and See **Allegations of Abuse made against staff** below.

8. Recognising abuse and taking action

All staff are trained, and expected, to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether they have a statutory education health and care (EHC) plan or not)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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
- 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 (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- 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

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, please take any references to the DSL to mean “the DSL (or deputy DSL)”.

8.1 If a child is suffering or likely to suffer harm, or in immediate danger

If liaising with the DSL does not cause delay that would put the child at greater or more imminent risk of suffering harm, they should be informed and consulted with immediately. The size and specialism of our school is such that, in the majority of cases, this should be possible.

However, where it would cause unreasonable delay, make a referral to local authority children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Where a child has a social worker, concerns should be raised with them directly. If they are unavailable, contact their team manager or the relevant children's social care team.

The nature of our school's cohort is such that we engage with multiple Local Authority teams and, by extension, multiple children's social care teams. Staff can use the following link to the GOV.UK webpage for reporting child abuse to the relevant local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

Tell the DSL as soon as possible if you make a referral directly.

8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show if you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Try to base any empathy in how the situation might affect the child. Avoid criticising the alleged perpetrator. E.g. 'That must have been very hard for you'.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Record the conversation on CPOMS as soon as possible in the child's own words. Stick to the facts, and do not let your own judgements or interpretations cloud the record. If possible, avoid writing notes whilst the child is talking to you.

- The CPOMS report should automatically notify the DSL and SLT. This should always be followed up by a conversation directly with the DSL as soon as possible: be that face-to-face, by phone or via Teams video conferencing.
- Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so.
- Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

If the child changes their mind and/or ceases to make a disclosure to you:

- Reassure them that you are available for them and that they would be doing the right thing by telling you.
- Record the conversation on CPOMS as soon as possible in the child's own words. Stick to the facts, and do not let your own judgements or interpretations cloud the record.
- Be clear at what point, or due to what potential trigger, the disclosure ceased.
- The CPOMS report should automatically notify the DSL and SLT. This should always be followed up by a conversation directly with the DSL as soon as possible: be that face-to-face, by phone or via Teams video conferencing.
- Alternatively, if appropriate, make a referral to local authority children's social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so.
- Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

8.3 If you discover that FGM has taken place, or a pupil is a risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in **Specific Safeguarding Issues** below.

Any member of staff who either:

- Is informed by a girl that an act of FGM has been carried out on her; or
- Observes physical signs (e.g. during the course of personal care or assistance with toileting for a child with severe or profound learning disabilities. *There are no circumstances where*

staff should conduct any form or physical examination.) which appear to show that an act of FGM has been carried out on a girl

must immediately report this to the police, personally. This is a mandatory statutory duty, and staff will face disciplinary procedures for failing to meet it.

Where a girl appears/discloses to have recently been a victim of FGM, or a member of staff believes she is at imminent risk, they should act immediately – this may include phoning 999.

They should also record all information on CPOMS (as per **8.2** above) and discuss the case with the DSL, involving local authority children's social care as appropriate.

8.4 If you have concerns about a child

If you believe a child is suffering or likely to suffer from harm, or is in immediate danger, please refer to **8.1** above.

When concerned about the welfare of a child, staff should always act in the best interests of the child.

Staff should not assume that a colleague or another professional has, or will, take action.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff should refer to other safeguarding professionals, members of the senior leadership team, executive leadership team or directors' team (as detailed in **Important Contacts** above) and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children's social care directly, if appropriate or directed to do so (see **Referral** below).

Share any action taken with the DSL as soon as possible via CPOMS and in person. Staff should record all activity on CPOMS including, but not limited to;

- Details of issues/observations that have caused their concerns
- Dates and times of attempts to contact/consult with safeguarding and leadership colleagues or professionals (as above)
- Dates and times of conversations/consultations with safeguarding and leadership colleagues (as above) that did take place
- An overview of these conversations and any actions they have taken

Early Help Assessment

If an early help assessment is appropriate, the DSL will lead on liaising with other agencies and setting up an inter-agency and multi-disciplinary assessment as appropriate.

Staff may be required to support other agencies and professionals in an early help assessment.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be recorded in detail, monitored and reviewed.

Referral

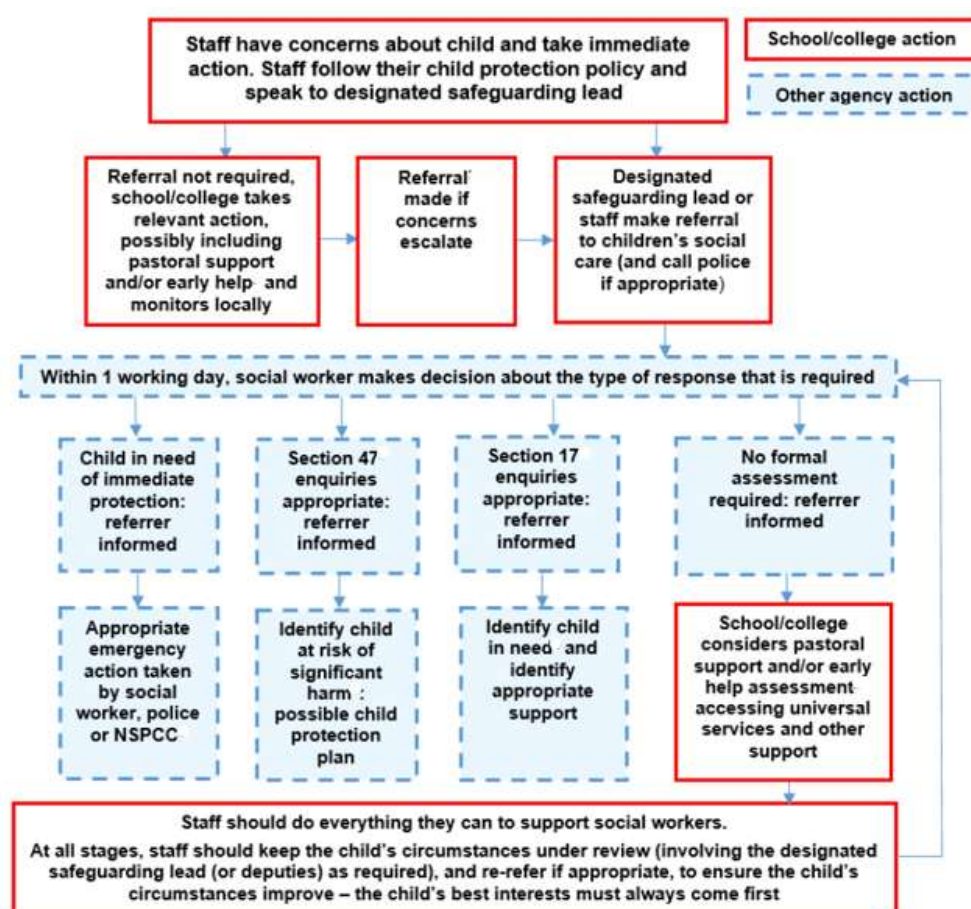
If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or, where appropriate, support a member of staff to do so.

Where a member of staff makes a referral directly (see **7.1** above), they must record this on CPOMS immediately and inform the DSL directly as soon as possible. This could be via telephone or Teams.

The local authority should make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know 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.

The DSL or person who made the referral will be consistent, insistent and persistent in following up any referrals made to local authorities that are not responded to within statutory timescales. They must record all communication regarding such escalation on CPOMS including the time and date.

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.



8.5 If you have concerns about extremism

If you believe a child is suffering or likely to suffer from harm, or is in immediate danger, please refer to **8.1** above.

Our school is committed to the preventing children from being drawn into terrorism. Our full approach to tackling radicalisation and extremism is detailed in the **Prevent Policy**.

When concerned about the welfare of a child, staff should always act in the best interests of the child.

Staff should not assume that a colleague or another professional has, or will, take action.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff should refer to other safeguarding professionals, members of the senior leadership team, executive leadership team or directors' team (as detailed in **Important Contacts** above) and/or take advice from local authority children's social care, particularly the LA Prevent Team/Co-ordinator (as detailed in **Important Contacts** above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police, the LA Prevent Team/Co-ordinator, or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DSL will make referrals in-line with all usual principles as outlined in **8.4** above.

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

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

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

8.6 If you have concerns about mental health

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 will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section **8.4** above.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

The DSL will co-ordinate with:

- Parents and Carers
- SLT
- Mental Health First Aiders (MHFA)
- Programme Psychologists (PP)
- Therapeutic Pastoral Leads (TPL)
- Special Educational Needs Co-ordinators (SENCOs)
- The child's key worker, teachers and/or trusted adults
- Local authority teams

To agree a plan of **prevention, identification, early support** and **access to specialist support** as appropriate.

8.7 Concerns about a staff member, supply teacher, volunteer or contractor

Our full approach to concerns about staff members (including a supply teacher, volunteer or contractor) is detailed in the **Managing allegations against a member of staff policy** and the **Low-Level Concerns Policy**.

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing, or potentially posing, a risk of harm to children, speak to the headteacher as soon as possible.

If the concerns/allegations are about the headteacher, speak to the regional director or chair of governors.

If the concerns/allegations are about the regional director or chair of governors, speak to the senior director of education services.

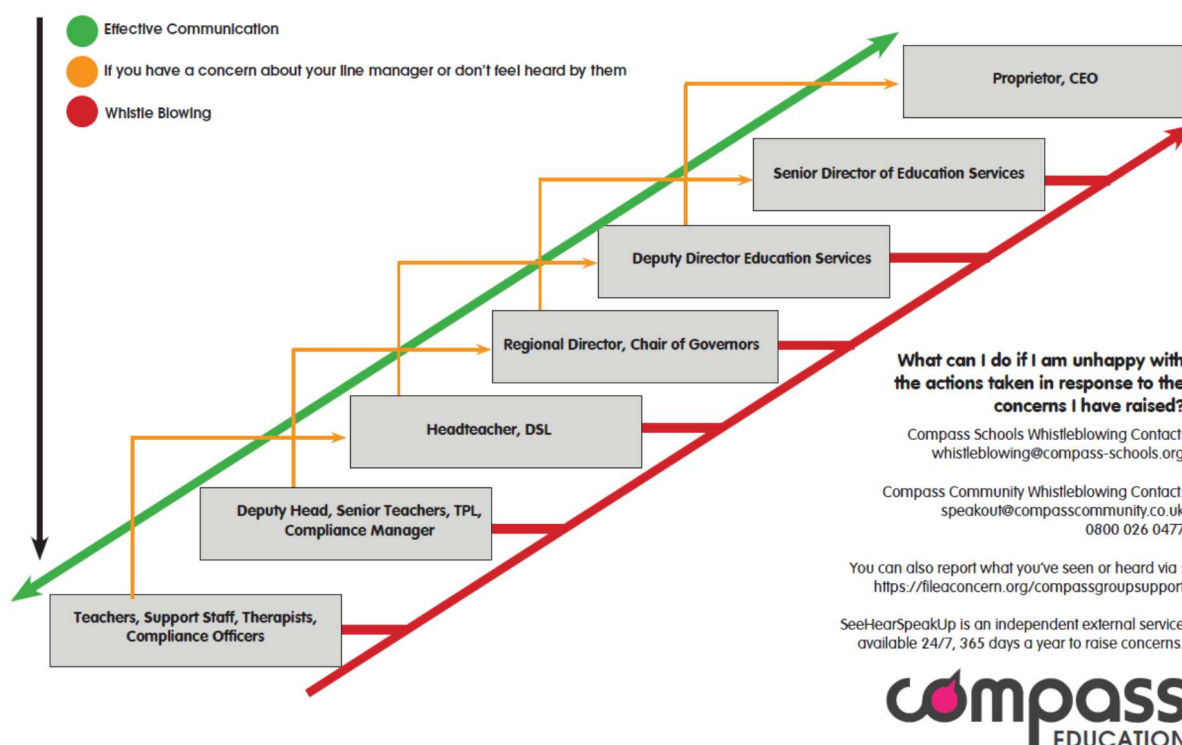
If the concerns/allegations are about the senior director of educational service, speak to the proprietor/CEO.

The appropriate leader, as above, will then follow the procedures set out in **Managing allegations against a member of staff policy** and the **Low-Level Concerns policy** as necessary.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to a senior leader, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Raising Concerns, Being Heard and Whistleblowing



8.8 Allegations of child-on-child abuse

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

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See **Specific Safeguarding Issues** below for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

All victims will be reassured that they are being taken seriously and that they will be supported and kept safe.

If a pupil makes an allegation of abuse against another pupil, best practice as outlined in **8.2** above should be adhered to, whilst bearing in mind the below in addition:

- You must record the allegation and tell the DSL as per **8.2**, but staff should not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan (see below) into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
 - Risk assessments will be recorded in writing, shared with all appropriate professionals involved, and will be kept under short-interval review.
- The DSL will engage with the relevant therapeutic, mental health and pastoral professionals as appropriate, including children and adolescent mental health services (CAMHS) and any other local authority teams

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. The DSL will liaise with the police if there are any questions or concerns about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, all staff will always:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Deliver targeted work on assertiveness and keeping safe, as appropriate, to those pupils identified as being at risk. This may be undertaken through individual therapy programmes or interventions

- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL, in collaboration with executive leaders and regional directors where appropriate, will take the lead role in any disciplining of the alleged perpetrator(s). The school is committed to providing holistic support and intervention at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

8.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers (this is the DSL's responsibility)
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school and Compass Community staff – this will include the staff member who reported the incident and the executive headteacher and/or regional director.

Compass Community Services, also employs **Safeguarding Social Workers** and **Safeguarding Team Managers** that will be consulted where appropriate.

This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
 - a referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

- Whether to contact parents or carers of the pupils involved
 - in most cases parents/carers should be informed and involved at this stage in order to best support the child.
 - The only occasions where this would be in question is if there unless there is good reason to believe that involving them would put the child or young person at risk of harm
- If a referral needs to be made to the police and/or children's social care
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual

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

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. (See **Specific Safeguarding Issues** below for more information on assessing adult-involved incidents)
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual or violent acts
- Any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and executive headteacher and regional director, may decide to respond to the incident without involving the police or children's social care.

The decision to respond to the incident without involving the police or children's social care should only be made in cases where the DSL is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the education setting's therapeutic and pastoral support and disciplinary framework. Where any doubt remains, the DSL will consult with police or children's social care.

This decision should take into account proportionality as well as the welfare and protection of any child or young person. The decision should be reviewed throughout the process of responding to the incident and recorded in line with the procedures set out in this policy.

The DSL can still choose to escalate the incident at any time, or if further information/concerns are disclosed later.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS, detailed in **Record-Keeping** below.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHE (including RSHE) curriculum.

8.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We do, however, commit to acting in the child's best interests regardless of their wishes and feelings.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

All children are made aware, via consultation, posters and via our therapeutic approach, that they can share concerns with any member staff, regardless of their role.

The school is committed to ensuring that pupils are aware of behaviours towards them that are unacceptable and how they can keep themselves safe

All pupils are informed that we have a Designated Safeguarding Lead (DSL), who is a senior member of staff with responsibility for safeguarding and child protection. Likewise, pupils are informed that there is a deputy DSL who they can talk to. We inform pupils of whom they might like to talk to both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.

In addition to this;

- DSL information posters are displayed around the school
- Governors arrange for time to speak with pupils when they visit the school
- curriculum content includes social and emotional aspects of learning and a comprehensive curriculum response to online safety, enabling children to learn about the risks of new technologies and social media and to use these responsibly.

- curriculum content includes a range of safeguarding awareness topics to help children stay safe, recognise when they do not feel safe and identify who they might or can talk to.
- Every member of staff is trained to respond appropriately to a child presenting concerns
- We work closely with multi-agency team, meaning that any concerns shared outside of school can be supported in school
- We monitoring children who have been identified as having welfare or safeguarding concerns and providing appropriate support and opportunities to talk.

Pupils within our school are treated with dignity and respect and their views are listened to. School's arrangements for consulting with and listening to pupils are:

- School council
- Pupil Ambassador Meetings
- Individual Pupil consultations and parent's evenings
- Governor visits
- Pupil questionnaires
- Reflections
- Celebration assemblies

9. Online safety and the use of mobile technology

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to the **Online Safety Policy**.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- › Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- › Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- › Set clear guidelines for the use of mobile phones for the whole school community
- › Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above, we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- Make sure staff are aware of all restrictions placed on them with regards to the use of their mobile phone and cameras, via the **staff code of conduct**.
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Enact clear and proportionate sanctions if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Develop, regularly review and publish our approach to searching, screening and confiscation within the **Behaviour for Learning Policy**

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out regular review of our approach to online safety, supported the **Head of Group IT** and their team
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

9.1 Artificial Intelligence

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Our school recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully pupils in line with this policy and our Counter Bullying and Behaviour for Learning policies.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school in conjunction with the DSL and the Head of Group IT.

10. Pupils with special educational needs, disabilities (SEND) or health issues

This section summarises our approach to children with SEND of health issues, specifically through the lens of safeguarding and within the scope of this policy. For full details about our school's policies in this area, please refer to the **SEND Policy**.

We are an independent special school (ISS). As such, every pupil in our school, regardless of whether they have an EHC Plan, and regardless of whether or not they have a formal diagnosis, has some form of SEND.

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

To address these additional challenges our school ensures that these children receive targeted and specialist additional monitoring, therapeutic and pastoral support and that all members of staff receive specific training to identify and manage concerns accordingly. These are detailed across our suite of policies procedures.

The DSL, wherever appropriate, will liaise closely with SENCO and with therapeutic-pastoral practitioners and colleagues regarding all safeguarding concerns.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We 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 mental health.

The DSL and all members of staff will work consistently and closely with, and support, social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are conjoinedly made in the best interests of the pupil's safety, welfare and educational outcomes.

For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- Responding to, and providing strategies to support, challenging behaviour
- The provision of therapeutic, pastoral and/or academic support
- The school's communication and relationships with families, parents and carers

12. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed an appropriately trained Designated Teacher for Children Looked-After (DT for CLA) to take the lead on promoting the educational achievement of looked-after and previously looked-after children. Their details are outlined in **Important Contacts**, above.

As part of their role, they 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
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

13. Pupils who are lesbian, gay, bisexual or gender questioning

Please note: The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published. This section has been written with the drafted and unfinalized text in mind .

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our **Behaviour for Learning Policy** and our **Counter Bullying Policy** for more detail on how we prevent and respond bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Staff with concerns regarding the mental health of any child, including concerns that might be related to their sexuality or gender, should refer to section **8.6** above, including reporting them to the DSL.

We will support children who may be suffering with their mental health via bespoke interventions and strategies facilitated by, developed and agreed upon by:

- Mental Health First Aiders (MHFA)
- Programme Psychologists (PP)
- Therapeutic Pastoral Leads (TPL)
- Special Educational Needs Co-ordinators (SENCOs)
- The child's key worker, teachers and/or trusted adults
- Parents and carers

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

14. Complaints and whistleblowing

14.1 Complaints against staff

Complaints against staff regarding an issue related to the safety or wellbeing of a child will be handled in accordance with our procedures for dealing with allegations of abuse made against staff. These are outlined in the **Managing allegations against a staff member policy**. See also the **Low-level concerns policy**.

14.2 Other complaints

For details of how we manage complaints, please refer to the **Complaints Procedure**.

14.3 Whistle-blowing

This section summarises our approach to Whistleblowing. For full details about our school's approach, please refer to the **Speak Out 'Whistleblowing' Policy**.

If you are unhappy with the response to any concerns that you have raised, contact:

- Compass Schools Whistleblowing
whistleblowing@compass-schools.org
- Compass Community Whistleblowing Contact
speakout@compasscommunity.co.uk

0800 026 0477

SeeHearSpeakUp is an independent external service available 24/7, 365 days a year. You can share your concern anonymously via <https://fileaconcern.org/compassgroupsupport>

15. Record-Keeping

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing, usually on CPOMS.

This should include instances where referrals were **or were not** made to another agency such as local authority children's social care or the Prevent programme, etc.

Our School maintains a very low threshold for what is deemed 'recordable'. Thorough and accurate records support the development over time of a detailed picture and contextual understanding of a child's circumstances. Whilst something may not seem significant in isolation, it may be of importance 'in the round' or at a later stage. If you are in any doubt about whether to record something, make the record and discuss it with the DSL.

See **CPOMS Recording** below for more information.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved (including dates, times and the names of those involved)
- A note of any action taken, decisions reached and the outcome (including dates, times and the names of those involved)

All safeguarding records should be digitally stored.

- Details of incidents and activity (as above) are detailed on CPOMS.
 - Every member of staff will be granted access to CPOMS on their commencement of role. This will enable them to record concerns.
 - Key members of staff will have elevated access which allows them to add subsequent actions to reports made. This requires two-factor authentication (2FA), and will be assigned by the DSL
- The DSL will store additional documents relating to safeguarding concerns, such as referrals forms etc, in a separate child protection file for each child.
 - The DSL will work with the Group Head of IT to ensure that all files are secure and that only appropriate staff have access to these files via password protections and/or access management.

Any non-confidential records will be readily 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.

Safeguarding records relating to individual children will be retained until the child is 25 years of age.

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 as soon as possible, securely, and separately from the main pupil file.

A record will be made of the transfer and a confirmation of receipt from the new school requested.

To allow a child's new school/college to plan effective transitions and to have support in place when the child arrives, this will be within

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

When a pupil is due to transfer to another school the DSL will consider if it would be appropriate to share any information with the new school or college in advance of the pupil 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.

When a new pupil joins our school, and there is a record of safeguarding or welfare concerns, we will ensure that this information is shared appropriately with the DSL, the Special Education Needs Coordinator (SENCO) and the Designated Teacher for LAC, as necessary.

See the **Managing Allegations against a member of staff policy**, the **Low-level concerns policy** and the **Safer Recruitment policy** for also for details of how we keep records in such instances.

15.1 Information sharing

Our school refers to guidance on matters of information sharing from [Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers May 2024](#).

This guidance details **The Seven golden rules for sharing information (including personal information)**:

- I. **All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.**

The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

- II. **When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.**

You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

- III. **You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.**

You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

- IV. **Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.**

Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.

- V. **When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**
- VI. **Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.**

Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

- VII. **Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.**

When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision

if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

15.2 CPOMS Recording

Our school uses CPOMS to support a strong safeguarding culture of vigilance, professional curiosity and professional responsibility.

As stated above, our school maintains a very low threshold for what is deemed 'recordable' and CPOMS records are not solely restricted to what might be typically considered a safeguarding concern. CPOMS is also used to log:

- Negative or challenging behaviour
- Positive behaviour of note
- Notable interactions or conversations between peers
- Notable interactions or children have with adults
- Notable communications with parents, carers and other members of a child's network
- Any information which may be relevant in building a shared understanding of a child's circumstances or presentations and will allow staff to
 - Recognise patterns
 - Analyse behaviour
 - Maintain transparency
 - Inform support strategies or interventions
 - Exercise professional curiosity
 - Evidence professionalism

CPOMS Record Writing

All staff will receive comprehensive training regarding CPOMS recording and best practice as part of their centralised induction.

When writing a CPOMS record, staff should;

- Complete and submit the report by the end of the day on which the incident occurred.
- Where this is not possible inform the DSL immediately and ensure the report is complete and submitted by not later than 24 hours after the incident occurred.
- If the report details safeguarding concerns, this should always be followed up by a conversation with the DSL, or one of their deputies. This can be face to face, by telephone or via Teams.
- Assign reports to one child only. Do not link pupils.
- Use the *name* of the child you are writing about
e.g. 'James was in the playground...'
- Use the *initials* of other children included in the reports and indicate they are a peer
e.g. 'JB (peer) was in the playground...'
- When referring to staff;
 - Use their full name and role the first time they are mentioned

‘Sarah Brown (HLTA) was in the playground...’

- Use their initials thereafter

‘SB offered reassurance...’

- Ensure the date and time stamp reflect the time incident/action *took place*
(If this is not edited, CPOMS will automatically generate the time and date the incident report *was created/written*)
- Assign the report to relevant members of staff e.g. Form Tutor, TPL, SENCO etc.
(All CPOMS records are automatically assigned to the DSL and Deput DSLs)

Reviewing and Responding to CPOMS Reports

DSLs, DDSLs and any other member of staff that have been assigned to a CPOMS report will receive automated email notification.

DSLs and DDSLs will monitor CPOMS on a daily basis.

All colleagues with 2FA receive alerts via their CPOMS dashboard, detailing all new/unseen reports that have been assigned to them in descending chronological order.

The DSL will review and respond to all reports marked/tagged with ‘Safeguarding’ immediately wherever possible, but by no later than the end of the day on which they were received, in accordance with process laid out in this policy.

CPOMS reports status are marked as either ‘Active’ or ‘Closed’. All active reports must be assigned to a member of staff with actions pending and under review to avoid drift and delay. ‘Closed’ reports do not need to be assigned to a member of staff.

16. Training, Induction and Supervision

16.1 All Staff

All staff members will undertake safeguarding and child protection training at induction. This will entail, but not be limited to:

- Ensuring they understand the school’s safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect
- This **Safeguarding and child protection policy**
- The relevant sections of the most recent version of **Keeping Children Safe in Education**
- The **Behaviour for learning policy**
- The **Staff code of conduct**
- The role of the DSL
- CPOMS and Recording
- Risk Management
- Whistle-blowing procedures and the **Whistle-blowing policy**

- Our approach as laid out in the **Online Safety policy** including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Physical Intervention training (PRICE Training) in conjunction with the **Physical contact with children policy**

All staff will have the above policies shared with them and will sign an acknowledgement that they have read them in their entirety and understood them, in addition to:

- **Managing allegations against a staff member Policy**
- **Low level concerns Policy**
- **Health and Safety policy**
- **Equity Policy and Equity Objectives**
- **Staff Handbook**
- **Countering Bullying Policy**
- **SEND Policy**
- **Learning Environment policy**
- **Supervision policy**
- **Risk Management and Risk Assessment policy**
- **Attendance and Registration Policy**
- **Complaints procedure**
- **First aid policy**

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas. This will involve an of the school's Prevent Policy.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings). The DSL will provide daily briefings to all staff which will include said updates, as well as relevant learning and information pertaining to current issues, approaches and strategies to support children on roll at the school.

Agency staff and volunteers will also receive safeguarding training and induction.

Staff members who are unable to attend training will be required to attend other relevant training to in lieu, either by attending another Compass school's training event, or receiving 1:1 training from the DSL or their deputies. The DSL will be responsible for facilitating this in all circumstances, regardless of the method of delivery.

16.2 The DSL and deputies

The DSL and deputies will undertake DSL Training at least every 2 years. Wherever possible, the preference is for this to be undertaken via the Local Authority.

Where this is not available, or where undertaking these courses would place the DSL and/or deputies out of reasonable timescale for renewal, the NSPCC is the preferred provider.

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).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies

16.3 Governors and the proprietor

All governors, including the proprietor, receive training about safeguarding and child protection (including online safety) at induction which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors, or the proprietor, may be required to act as the 'case manager' in the event that an allegation of abuse is made against a senior leader, they also receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training.

The preferred provider for this training is the NSPCC.

For full details regarding our approach to safer recruitment, please refer to the **Safer Recruitment Policy**.

16.5 Support, guidance and supervision of staff

We recognise that all our staff can face challenging experiences in the course of their roles and are committed to supporting them. In order to ensure staff can discuss their practice in a supportive environment, and to continue to develop their practice in supporting and safeguarding children with

complex trauma, needs and environmental challenges, all staff will receive regular, formal, recorded supervision.

For full details please refer to the **Supervision Policy**.

17. Monitoring Arrangements

This policy will be reviewed **annually** by the Deputy/Regional Director for Safeguarding. At every review, it will be approved by the full governing board.

Quality assurance and governance processes are in place to monitor the implementation of, and compliance with, this policy. This includes Half Termly Headteacher Audits (HHFTAs) of welfare concern and safeguarding files and records by the DSL.

The school completes an audit of all safeguarding arrangements at least annually using the audit tool developed and provided by the 3 safeguarding partners appropriate to the local authority in which the school is geographically situated – referred to here as the 'Local Authority Safeguarding Audit'.

Where the 'Local Authority Safeguarding Audit' is not deployed or available on an annual basis (e.g. where LA expectation is that it is completed biennially) the school commits to:

- Using the available documentation from the LA to conduct the review regardless.
- Where the documentation or tool is not available from the LA, using the internal Annual Safeguarding Audit set out in **Appendix 4**.

The SLT, the executive leadership team, the directorship and the governing body will ensure that action is taken to remedy, without delay, any deficiencies or weaknesses identified in safeguarding or child protection arrangements.

Appendix 1: Types of Abuse

This appendix is based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- › Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- › 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
- › Seeing or hearing the ill-treatment of another
- › Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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
- › Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:

- › Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- › Protect a child from physical and emotional harm or danger
- › Ensure adequate supervision (including the use of inadequate care-givers)
- › Ensure access to appropriate medical care or treatment

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

Appendix 2: Specific Safeguarding Issues

This appendix is based on the Department for Education's statutory guidance, **Keeping Children Safe in Education**.

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's **advice for education settings**.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as ‘sextortion’) is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person’s account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim’s bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Children who are absent from education

For full details about our school’s approach to children who are absent from education, please refer to the **Attendance and Registration Policy**.

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or

child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work

in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual 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. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- 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 nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 8.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of 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.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

For more information, see **Operation Encompass**.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

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

The DSL and deputies will, where necessary, facilitate referral routes to the local housing authority so they can raise/progress concerns at the earliest opportunity in accordance with local procedures.

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (HBA) (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 8.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
 - Many communities practise FGM, but those at particular risk in the UK originate from:
 - Somalia
 - Egypt
 - Sudan
 - Sierra Leone
 - Eritrea

- Gambia
- Ethiopia
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from school
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer

- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others; or
 - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **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 of terrorism 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.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 8.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the **Prevent policy**.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will, with support from the DSL and deputies :

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 8.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

For full details about our school's approach to checking the identity and suitability of visitors, please refer to the **School Visitor Policy**.

Our school recognises that there can be no complacency where child protection and safeguarding procedures are concerned. The school therefore requires that **ALL VISITORS** (without exception) comply with the policy and procedures outlined in the **School Visitor Policy**. Failure so to do may result in the visitors being escorted from the school site.

All visitors to the school will be asked to bring formal identification with them at the time of their visit.

At the door or reception, all visitors must state the purpose of their visit and who has invited them. They should be ready to produce formal identification upon request.

All visitors will be asked to sign the GDPR Visitors Record Book which is kept in reception at all times making note of their name, organisation, time and who they are visiting and car registration.

All visitors will need to read the safeguarding and fire evacuation information on signing in.

All visitors will be required to wear a red visitor Lanyard (the lanyard will be a green visitor lanyard if the visitor is on the school SCR) – the lanyard must remain visible throughout their visit.

Visitors will then be escorted to their point of contact **OR** their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site. The visitor will not be allowed to move about the site unaccompanied unless approved by the DSL or they are on the SCR.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- › Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- › The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will take reasonable steps to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

Every pupil on roll is subject to an individual Missing Persons (MisPer) risk assessment.

Appendix 3

Job Description: Designated Safeguarding Lead (DSL)

Motivate Educate Inspire

‘Compass Community Schools motivate children and young people to engage with education and overcome barriers to learning. Our vision is to inspire learners to make positive life choices and to provide pupils with a therapeutic education which enables them to make the most of their life chances.’

Job Details

Contract: Full time. Permanent.

Reporting to: Headteacher/Executive Headteacher/Regional Director

Responsible for: Deputy DSL(s)

This Job Description is illustrative of the general nature and level of responsibility of the role. It is not a comprehensive list of all tasks that the DSL will carry out. The postholder may be required to undertake other duties appropriate to the level of the role.

Compass Community Schools are committed to creating a diverse workforce. We will consider all qualified applicants for employment without regard to sex, race, religion, belief, sexual orientation, gender reassignment, pregnancy, maternity, age, disability, marriage or civil partnership.

Ethics and Professional Conduct

The DSL will:

- Like other teachers, meet the [Teacher Standards](#).
- As a leader, demonstrate consistently high standards of principled and professional conduct by upholding and demonstrating the [Seven Principles of Public Life](#) at all times.
Known as the Nolan principles, these form the basis of the ethical standards expected of public office holders:
 - Selflessness
 - Integrity
 - Objectivity
 - Accountability
 - Openness
 - Honesty
 - Leadership
- Build relationships rooted in mutual respect, and at all times observe proper boundaries appropriate to their professional position.
- Show tolerance of and respect for the rights of others, recognising differences and respecting cultural diversity within contemporary Britain.
- Uphold fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

- Ensure that personal beliefs are not expressed in ways which exploit their position, pupils' vulnerability or might lead pupils to break the law.
- Uphold their obligation to give account and accept responsibility.
- Know, understand, and act within the statutory frameworks which set out their professional duties and responsibilities.
- Take responsibility for their own continued professional development, engaging critically with updates to frameworks, legislation, statutory- and non-statutory guidance and local policies and procedures outlined by the 3 safeguarding partners.

Main Purpose

The DSL will take lead responsibility for safeguarding and child protection across the school (including online safety and understanding the filtering and monitoring systems in place).

They will take part in strategy discussions and inter-agency meetings, and contribute to the assessment of children.

They will advise and support other members of staff on child welfare, safeguarding and child protection matters, and liaise with relevant agencies such as the local authority and police.

Some safeguarding activities may be delegated to deputies, but the DSL will retain ultimate lead responsibility for safeguarding and child protection.

Duties and Responsibilities

Managing Referrals

- Refer cases of suspected abuse and neglect to the local authority children's social care
- Support staff who make referrals to the local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern
- Support staff who make referrals to the Channel programme
- Refer cases to the Disclosure and Barring Service where a person is dismissed or leaves due to risk or harm to a child
- Refer cases to the police where a crime may have been committed
- Train, support and quality assure the use of CPOMS to record safeguarding and child protection concerns and activity in compliance with the Safeguarding and Child Protection Policy.
- Respond to all CPOMS reports in a timely and robust manner in compliance with the Safeguarding and Child Protection Policy.

Working with staff and other agencies

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Inform the headteacher, executive headteacher and/or regional director (as appropriate) of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations, and the requirement for pupils to have an appropriate adult

- Liaise with the case manager and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member in conjunction with headteacher, executive headteacher and/or regional director (as appropriate)
- Liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety), and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- Liaise with the therapeutic pastoral leads, programme psychologists and Compass Community mental health leads and, where available, LA mental health support team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the headteacher, executive headteacher and/or regional director (as appropriate), taking lead responsibility for promoting educational outcomes by:
 - Knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced
 - Identifying the impact that these issues might be having on children's attendance, engagement and achievement at school
- The above includes:
 - Ensuring the school knows which children have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort
 - Supporting teaching staff to provide additional academic support and/or reasonable adjustments to help these children reach their potential

Managing Child Protection Records

- Ensure child protection files are kept up to date including contact details for relevant professionals and those with parental responsibility
- Keep information confidential and store it securely in compliance with the Safeguarding and Child Protection Policy
- Make sure records include:
 - A clear and comprehensive summary of the concern
 - Details of how the concern was followed up and resolved
 - A note of any action taken, decisions reached and the outcome
 - Correspondence with safeguarding colleagues, agencies and parents/carers
- Ensure files are only accessed by those who need to see them, and that where a file or content within it is shared, this happens in line with information sharing advice as set out in Keeping Children Safe in Education (KCSIE)
- Where children leave the school (including in-year transfers):
 - Ensure their child protection file is securely transferred to the new school as soon as possible, separately from the main pupil file, with a receipt of confirmation, and within the specified time set out in KCSIE

- Consider whether it would be appropriate to share any additional information with the new school before the child leaves, to help it put appropriate support in place

Raising Awareness

- Ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- Work with the governing board and the executive leadership team to ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly
- Ensure the child protection policy is available publicly and parents and carers are aware that referrals about suspected abuse or neglect may be made and the role of the school in this
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- Help promote educational outcomes by sharing information with teachers and school leadership staff about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing
- Chair weekly safeguarding meetings with the school's DSL/DDSL team and appropriate members of SLT to develop to
 - Contribute to the development and maintenance of a school-wide culture of impactful and effective safeguarding practice
 - Maintain momentum and oversight of safeguarding and child protection matters

Training

- Undergo training (at least every 2 years) to gain the knowledge and skills required to carry out the role and meet the expectations set out in KCSIE, including those outlined in the 'Training, knowledge and skills' section of annex C
- Undertake Prevent awareness training
- Refresh knowledge and skills at regular intervals and at least annually
- Attend Compass Community Schools DSL network meetings as well as relevant Local Authority DSL network meetings and training events

Providing Support to Staff

- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters
- Deliver and/or facilitate appropriate safeguarding and child protection training, including online safety, and staff responsibilities in relation to filtering and monitoring
- Identify relevant training for all school staff in response to critical engagement with updates to frameworks, legislation, statutory- and non-statutory guidance and local policies and procedures outlined by the 3 safeguarding partners.
- Support staff during the referrals process
- Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support
- Support all new staff during induction periods

Understanding the views of children

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them

- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

Holding and sharing information

- Understand the importance of information sharing, both within the school, with other schools and colleges on transfer, and with the safeguarding partners, other agencies, organisations and practitioners
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Keep detailed, accurate, secure written records of concerns and referrals

Filtering and Monitoring

Work with the Group Head of IT Services, the IT Team and the executive leadership team to:

- Understand the filtering and monitoring systems and processes in place in the school, including how to manage them effectively and escalate concerns when identified
- Make sure that the filtering and monitoring systems and processes block harmful and inappropriate content without unreasonably impacting teaching and learning
- Review filtering and monitoring provision at least annually

Governance and Accountability

The DSL will:

- Understand and welcome the role of effective governance, including accepting responsibility.
- Ensure that staff understand their professional responsibilities with regards to safeguarding and are held to account.
- Ensure the school effectively and efficiently operates within the required regulatory frameworks and meets all statutory duties.
- Collaborates successfully with other Compass Community Schools and the wider organisation.
- Collaborates successfully with other schools, organisations and teams to achieve mutually agreed objectives.
- Maintain working relationships through high quality, timely and effective communication with fellow professionals and colleagues to improve outcomes for all pupils.
- Produce regular, accurate and timely reports regarding where necessary and provide information, support and objective advice to the Headteacher, Executive Headteacher, Regional Director, the Governing Board and the Proprietary Board.
- Ensure that parents, carers and local authority teams are well informed about all aspects of safeguarding and child protection as appropriate.

Appendix 4



Annual Safeguarding
Audit (Non-LA) 2024-25