

## St Martins School

# Safeguarding and Child Protection Policy and Child Protection Procedures

*Selfless, Self-assured and Successful*

Approved: Autumn Term 2023

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## Key Personnel for St Martins School

Headteacher	Sue Lovecy
Designated Safeguarding Lead	Katherine Mooney
Deputy Designated Safeguarding Leads	Sue Lovecy, Chris Edwards, Carol Jones, Mandi Jones and Angela Herbert.

## Introduction

This policy applies to anyone working for, on behalf of or representing The 3-18 Education Trust (Trust) including members, trustees, local governors, senior managers, staff, volunteers, contractors, agency staff and students on placement. This policy has been agreed by the Board of Trustees following guidance issued by Shropshire Council.

The policy is publicly available on each of the Trust school websites (and on request from the Trust school) so that it can be accessible for children, their families and anyone visiting and /or working with the Trust.

The policy aims to meet the requirements as outlined in Keeping Children Safe in Education 2023 Part 2 (page 27).

## The Trust's Safeguarding Statement

The Trust believes that:

- **All children** have the right to protection from all types of abuse.
- **Everyone** has a responsibility to promote the welfare of all children and young people, to keep them safe and to practice in a way that protects them.

This means that the Trust will:

- Not tolerate the abuse of children. This includes never accepting and always challenging or raising concerns about words or actions which downplay, justify, or promote abuse. This applies to anyone who is part of, comes into or works in any of the Trust's settings.
- Be child centred and ensure that the best interests of children are considered in every aspect of the Trust's decisions and operations.
- Ensure a safe environment for children to learn, grow and develop is provided and children feel able to raise any concerns they may have for themselves or others.
- Look out for and respond promptly and appropriately to all identified concerns, incidents or allegations of abuse or neglect of a child.
- Ensure no child or group of children are treated less favourably by the Trust than others.
- Be aware of and take extra positive actions that may be needed to safeguard and promote the welfare of a child(ren) who the Trust knows are more vulnerable to experiencing abuse or discrimination.
- Work in partnership with the Trust's children, their parents, carers, and other agencies.

## Key Terms

**Safeguarding** and promoting the welfare of children is defined as:

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

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

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

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

There are a number of types of abuse and safeguarding issues that could increase the risk that a child could be abused. These are further defined and explained in Part 1, Part 5 and Annex B of Keeping Children Safe in Education 2023.

**Staff** refers to all those working for or on behalf of the Trust, full or part time, temporary or permanent in either a paid or voluntary capacity. The exceptions to this term are trustees and local governors.

**Trustees** refers to those who are part of the Trust Board.

**Local Governors** refers to those who are part of the individual school's Local Governing Body.

**Child** includes everyone under the age of 18.

**Parent** refers to birth parents and others who have parental responsibility (as defined by the Children's Act 1989) or has care of a child.<sup>1</sup>

## Roles and Responsibilities

### Trust Board

The Trust Board has a strategic leadership responsibility for ensuring the Trust takes a whole trust approach to safeguarding arrangements as outlined in this policy and that the Trust complies with duties under the related legislation and guidance listed later in this policy. Keeping Children Safe in

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<sup>1</sup> S576 Education Act 1996

Education Part 2 outlines the key responsibilities. The Trust Board has delegated some responsibilities, although retains accountability, as follows.

### **The Chief Executive Officer (CEO)**

The CEO ensures:

- Each Trust school has a Designated Safeguarding Lead (DSL) who has the appropriate status and authority to carry out the duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- Each Trust school adheres to this policy and has procedures in place (as outlined in Part 2 Keeping Children Safe in Education) that are implemented effectively and comply with the Trust's duties under the related legislation and guidance listed later in this policy.
- The Trust has adequate executive leadership by appointing:
  - Trust Safeguarding Lead (TSL): Claire Jones
  - Trust Safeguarding Consultant (TSL): Sadie Howson
- All staff are knowledgeable and confident in carrying out their safeguarding duties in line with training and the related legislation and guidance listed later in this policy.

### **The Safeguarding Link Trustee**

The Trust Board has appointed a Safeguarding Link Trustee who is responsible for meeting with the Trust Safeguarding Lead each term and reporting back to the Trust Board normally by a written report.

Safeguarding Link Trustee: Naomi Pritchard

### **Local Governing Bodies (LGB)**

Under the Scheme of Delegation, the Trust Board has delegated monitoring of the effectiveness and implementation of safeguarding arrangements at school level to LGBs. Each individual LGB will appoint a Safeguarding Link Local Governor. Each Safeguarding Link Local Governor is responsible for leading on the governance oversight of safeguarding arrangements. They meet with the DSL on a termly basis and report back to the LGB normally by a written report.

The Safeguarding Link Local Governors for the Trust's schools are as follows:

- Bowbrook Primary School: Phil Wilson
- Bridgnorth Endowed School: Tamsin Preece
- Coleham Primary School: Clare Wilson
- Much Wenlock Primary School: Stephen Goddard
- St Martins School: Toby Percival
- The Priory School: Richard Barrett
- Thomas Adams School: Matthew Barrett
- William Brookes School: Ann O'Brien

The Chair of the LGB will liaise with the CEO in the event of an allegation of abuse made against the Headteacher as outlined in the Ensuring Safe Staff section of this policy.

### **Headteachers**

Headteachers are responsible (with the support of the DSL for each school) for ensuring safeguarding arrangements are implemented effectively in their school. Responsibilities includes:

- Having the overarching responsibility of ensuring the effectiveness of the school's safeguarding arrangements as outlined in this policy.

- Being accountable and reporting to the LGB (with the support of the DSL) on the effectiveness of school safeguarding arrangements.
- Supporting and promoting a whole school safeguarding culture and ethos as outlined in the Safeguarding Statement. This includes ensuring that the Senior Leadership Team (SLT) work effectively together and with the DSL, to ensure a whole school approach to safeguarding.
- Taking the lead role in ensuring the school implements safe practice including ensuring staff are knowledgeable and confident in their safeguarding practice. The Headteacher is also the lead person responsible for receiving, managing, and referring to/liasing with the Local Authority Designated Officer (LADO) with the support of the DSL or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the DSL and any deputy(ies) to carry out their roles effectively. This means ensuring they are given sufficient time, training, support, resources, including cover arrangements where necessary.
- Ensuring that all school policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff.

### **The Designated Safeguarding Leads (DSL)**

The DSL for each school takes the lead responsibility for safeguarding and child protection in their school. Keeping Children Safe in Education 2023 outlines their key responsibilities. Deputy Designated Safeguarding Lead(s) (DDSL) support the DSL in the discharge of their responsibilities. Responsibilities include:

- Ensuring that the school has a Safeguarding and Child Protection Policy in place as required by Keeping Children Safe in Education, that is implemented and followed by all staff.
- Being available to deal with safeguarding and child protection during school hours. Each DSL will put in place cover arrangements for outside the school's day and term times. Details can be obtained by contacting the DSL.
- Acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and to their school.
- Supporting the Headteacher to implements safe practice in their school.
- Managing safeguarding referrals to the relevant Local Authority; Police and any other statutory authorities or multi-agency risk management arrangements (see DSL Response).
- Working closely with the LGB, Headteacher and relevant SLT members to ensure a whole school safeguarding culture and ethos as outlined in the Trust's Safeguarding Statement and the implementation of effective safeguarding arrangements.
- Acting as the point of contact to and proactively engaging with the Shropshire Safeguarding Community Partnership, Telford and Wrekin Safeguarding Partnership and other Safeguarding Partnerships depending on the child's home local authority, as outlined in Working in Partnership section of this policy.
- Ensuring children and parents are aware of how and encouraged to raise safeguarding concerns and how they will be responded to as outlined in Working in Partnership section of this policy.
- Acting as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in their school.
- Ensuring the effective management and oversight of safeguarding information as outlined in the Record Keeping and Information Security section of this policy.



- Maintaining records for staff and volunteers training.

### **All Staff (including students on placement and volunteers):**

All Staff are expected to work in line with the Trust's Safeguarding Statement and adhere to the policies, processes and systems of the Trust and each school that support safeguarding. This specifically includes the following areas which are outlined in this policy:

- Accessing and maintaining professional development and support to ensure they remain knowledgeable and confident in their safeguarding practice.
- Recognise, respond and report staff Safeguarding concerns.
- Engaging in safe practice. This includes raising concerns (however small) about individual behaviour or practices or cultures in schools that compromise the safety of children as outlined in Ensuring Safe Staff section of the is policy.
- Teaching children how to keep safe.

## **Professional Development and Support**

At the Trust, in order to ensure all staff are knowledgeable and confident in keeping children safe in the Trust's schools; staff will complete the professional development activities as outlined below: (see Appendix A)

- KCSiE quiz (annual)
- Raising Awareness Child Protection training (every 3 years)
- Termly Child Protection update training
- Prevent training (every 2 years)
- Cyber Security training (annually)

This is the minimum requirement for the Trust's staff and schools will assess and monitor individual staff's training needs. Schools will maintain professional development records.

The DSL and DDSL(s) provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal, and performance processes in school. The DSL and DDSLs receive regular support and supervision.

At St Martins School, the KCSiE training is delivered at the beginning of the Autumn term by the DSL; key changes are highlighted and responsibilities of all staff reinforced. In department teams a 'quiz' is completed digitally with submissions to identify any additional training requirements.

All new staff receive an induction meeting with the DSL to introduce school practice within St Martins School, to clarify policies and conduct expectations in order to safeguard both staff and pupils and discuss working knowledge of KCSiE.

The minimum training requirements for staff, volunteers, DLSs, DDSLs, trustees and local governors are outlined in Appendix A

## **Ensuring Safeguarding Practice Across the Trust**

### **Safer Recruitment**

The Trust adopts robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in any of the Trust's settings. All staff, involved in recruitment complete additional safer recruitment training; as outlined in the Professional Development and Support section of this policy. Recruitment procedures are outlined in the Trust's Safer Recruitment Policy and are in alignment with Keeping Children Safe in Education 2023: Part 3.

As part of the Trust's recruitment and selection processes; the Trust ensures that the commitment to safeguarding and promoting the welfare of children is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. The Trust also ensure that all applicants complete a robust application form. Suitable references are sought, and online social media checks may be carried out prior to interview; as well as ensuring that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

In accordance with Keeping Children Safe in Education 2023: Part 3; the Trust maintains a record of information received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students on placement). Pre-appointment safer recruitment checks are completed on trustees, local governors, contractors, and visitors who attend the Trust in a professional capacity. The Trust completes the checks on staff, volunteers, trustees, and local governors who are recruited by the Trust. For those who are recruited by others; the Trust ensures written confirmation that the relevant checks have been completed and their identification checked before they are allowed to work unsupervised or engage in regulated activity with children.

Where all the necessary information has not been obtained or there are gaps in the information, the Trust has robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability are allowed to work unsupervised or engage in regulated activity with children. The Trust reserves the right to refuse access to any Trust site any person who the Trust is not assured is safe to work or engage in regulated activity with children.

On appointment, staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of the Trust's settings.

If any safeguarding concerns of allegations arise relating to a member of staff, trustee, local governor or other person working on the Trust's school premises, staff are expected to act in line with the sections Ensuring Safe Staff and Staff Safeguarding Concerns: Recognise, Respond, Report within this policy.

### **Contractors**

The Trust has several contracts with external providers to work in the Trust's schools including with children. Each school writes to these contractors on an annual basis seeking written confirmation that all the necessary safeguarding checks have been carried out on all contractors coming into school. This information is then logged on each school's Single Central Record. A robust process is in place in each school when contractors arrive on site to ensure that the necessary checks have taken place before they are allowed entry into school.

### **Visitors**

The Trust has procedures for recording the details and confirming the identity of visitors, including prospective candidates for employment and volunteering. The Trust ensures that schools have control over who comes into the schools' premises so that no unauthorised person has unsupervised access to children.

All visitors sign in/out of St Martins School via the Invenry digital system, recording date/time of visit, person being visited, purpose of visit, registration of vehicle and a photograph of the visitor. A lanyard with digital photo is provided.

Visitors will await staff collection from the outer foyer area.

Green lanyards signify visitors for which DBS checks/assurances have been recorded. These visitors may have unsupervised access to children.

Red lanyards identify visitors which may not have unsupervised access to children.

All staff are reminded of these protocols and requested to challenge any 'red lanyard' individual should they encounter any such person without school staff presence.

School staff who are receiving visitors are aware that they must escort visitors on site (including to make use of toileting facilities) and to take to reception for signing out.

#### **Use of School Premises for Non-School Activities.**

When extra-curricular activities out of school hours are arranged in any of the Trust's schools, which are directly supervised/managed by school staff, this Safeguarding and Child Protection Policy is to be followed and any concerns should be managed in accordance with Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

The Trust will follow the Ensuring Safe Staff procedures as outlined below if it becomes aware of any allegations relating to an organisation or individual using school premises.

Where the Trust has sessions or activities which are provided by another person or organisation that is using any school site and not during school time or under direct supervision, each school will seek assurances that the person or organisation have the required child safeguarding arrangements in place as an individual/organisation as outlined in the DfE's [Keeping children safe during community activities](#). This is regardless of whether children who are on roll at a Trust school access the activity or not.

The requirements for safeguarding arrangements will be set out within any transfer of control agreement, (i.e. lease or hire agreement); and failure to comply with these arrangements will lead to termination of the agreement.

#### **Alternative Provision**

Where a child is placed with an alternative provision provider, the Trust will continue to be responsible for their safety and welfare and should be satisfied that the provider can meet the needs of the pupil.

Alternative provision placements are made use of for a small number of pupils in St Martins School; each student is carefully considered when placing them.

For students who attend regular work experience placements school staff visit site with pupils and safeguarding checks are in place; we obtain risk assessment and public liability insurance from places of employment. For long term placements checks are completed by a designated service provider (EBP).

Daily attendance checks with work placements/alternative provision are made to ensure the pupil is there and being safeguarded.

St Martins School also make use of alternative provision which supply school with written assurances that all staff members have up to date DBS checks. Staff also transport pupils to/from settings and maintain communications with staff with relevant safeguarding updates.

Full DBS checks are provided by all workers that work with pupils with personalised learning plans.

The Trust obtains written confirmation from the alternative provision provider that appropriate safeguarding checks have been conducted on individuals working at the establishment, i.e., those checks that the Trust would otherwise perform in respect of its own staff. See Appendix B: Alternative Provision Quality Assurance Checklist.

## **Ensuring Safe Staff**

### **Managing allegations (including low level concerns)**

In all Trust settings, an open and transparent culture is promoted in which all concerns about the behaviour or conduct of any adults working in, at or on behalf of the Trust are dealt with appropriately.

There are two levels of allegations/concerns:

#### **1. Allegations that may meet the harm threshold.**

Circumstances where someone working within the Trust has or may have:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates that they would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have occurred outside of a Trust setting that could pose a transferable risk.

Allegations that someone that working in, at or on behalf the Trust has met the harm threshold should be immediately referred to the school's Headteacher or TSL in person. Staff may be required to provide a written statement at the request of the Headteacher.

If the allegation relates to the Headteacher; this should be immediately reported to the CEO or TSL verbally.

If there is any conflict of interest or immediate risk of harm to a child or; then the person with the concern must ensure **immediate safety** and contact the LADO in accordance with [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#).

In most cases; the Headteacher (or the TSL) will lead on managing allegations; with the support of the Trust's HR and the DSL. They will ensure that Part 4 Keeping Children Safe in Education 2023 and [Shropshire Safeguarding Community Partnership Managing Allegations Procedures](#) are

applied. Any allegations that meet the above criteria will be referred to the LADO within 1 working day and the Trust will follow their advice and guidance.

It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fairly and consistent way, to effectively safeguard all those involved.

The Trust also has a duty of care towards staff, and the Trust will provide a named contact for the staff member.

If necessary, the Trust will adhere to the legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Keeping Children Safe in Education Part 3 if the criteria for such reporting is met.

## **2. Allegations / concerns that do not meet the harms threshold (low level concerns).**

The term low level does not mean that these concerns are insignificant. A low level concern is when staff or volunteer may have acted in a way that:

- Is inconsistent with the Trust's Staff Code of Conduct, including inappropriate conduct outside of work. The Staff Code of Conduct outlines examples of what could be considered a low-level concern.
- Does not meet the harm threshold at point 1 above.

Low level concerns should be reported in person to the DSL and/or Headteacher; to embed the culture of openness and transparency and to ensure that the Trust's values and expected behaviours are lived, monitored, and reinforced by all staff.

On receipt of a report of a low level concern, the Headteacher/DSL will gather as much information as possible.

The Headteacher will decide the outcome of all low level concerns (in consultation with the DSL and/or TSL if necessary). Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider school culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

### **Whistle Blowing**

Whistleblowing is the mechanism by which staff can raise concerns in good faith without fear of repercussions. All staff have a duty to raise concerns where they exist about another staff or volunteers' practice. This may include attitude or actions of colleague's poor or unsafe practice or potential failures in adhering to the schools' policies, procedures and Staff Code of Conduct.

If staff have such concerns; these should be raised with the DSL, Headteacher or TSL.

Please also refer to the Trust's Whistleblowing Policy available on the Trust's websites.

If staff feel unable to raise concerns with the Trust directly; they can contact [NSPCC Whistleblowing Advice Line](#).

### **Record Keeping and Information Security**

The Trust has a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). There are data protection processes in place to ensure that the

Trust keep and process (manage) personal information about children, their families; staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with [Meeting digital and technology standards in schools and colleges](#) (see also the Online Safety section of this policy)
- Manage requests for access to personal information held by the Trust (known as subject access requests).

Details of processes and how to request access to personal information held are outlined in The Data Protection Policy and Subject Access Request Procedure

### **Storage and Management of Safeguarding Information (Child Protection files)**

Safeguarding concerns and responses for individual children are kept electronically and securely in each of the Trust's schools on CPOMS (the electronic system for recording all safeguarding and child protection concerns/actions taken). Each school has a robust system in place whereby only DSLs are able to view safeguarding files for individual children.

If any of the Trust's schools are provided with Child Protection files when children are transferred into the school, they are stored securely and individually for each child and are separate to a child's main pupil file. The DSL is responsible for ensuring the quality, maintenance, and management of Child Protection files; as well as using the system to monitor themes and patterns of concern to inform and continue to improve the whole Trust approach to safeguarding.

### **Sharing Safeguarding Information**

The Trust is proactive in sharing information internally and with others who are working with the Trust's children and their families as early as possible; so that children can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse.

Staff are expected to share information with one another as part of their work in school about the needs and risks of children on a need-to-know basis in line with the Trust's Safeguarding Statement so that children are kept safe and their welfare promoted. Staff are not permitted to share information with friends, family, or anyone in the local community outside of their work.

### **Sharing Information with Other Organisations**

Staff should be familiar with and use the DfE's [Information sharing advice for safeguarding practitioners](#).

As part of the Trust's work in partnership with parents and children; consent to share their information with others outside of school should always be sought from a child and their parent(s) unless it is not safe to do so. This includes where seeking consent would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If a parent or child does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a child safe and promoting their welfare. Therefore, staff must make parents and children aware that information may still be shared with other organisations if necessary to help keep their child safe or promote their welfare or if there is another legal basis to do so.

Decisions to share safeguarding information with other organisations will be overseen by the DSL (refer to DSL Response section of this policy).

### **Transfer of Child Protection Files and Other Safeguarding Information**

When a child leaves for a new education setting; the DSL will arrange for the Child Protection file (and any additional information to assist the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting no later than within 5 working days of an in-term transfer or within 5 days from the start of the new term. Where the move is planned, the DSL will consider sharing information in advance of the child leaving to help with the child's transition and to enable any help and support they may need. This is shared separately to any child's main file and confirmation of receipt of the files should be gained (refer to Appendix C: File Transfer Record and Receipt).

If a child is absent from education or Electively Home Educated; the Trust shares relevant information with the Local Authority as required by law (refer to Children Potentially at Greater Risk of Harm section of this policy). If the child leaves one of the Trust's schools and does not move to a new education setting; their Child Protection file (and any additional information as necessary) is transferred to the relevant Local Authority that they reside in line with the local protocol.

### **Working in Partnership**

In order to ensure all children in the Trust's schools are effectively safeguarded and their welfare is promoted; the Trust will work in partnership with children, their parents and other agencies/partnerships as follows:

#### **Children**

Children are taught how to keep safe; including how and when to share or report any worries or concerns they may have about their safety and wellbeing or that of others. Depending on the setting, the Trust encourages children to share and report worries and concerns. At St Martins School this is by:

- Speak to tutor/class teacher/learning support assistant
- Speaking to Student Support Services in school (drop-in)
- Contacting DSLs via Teams
- Request for DSL/Student Support to meet student (email request direct/via teacher/tutor)
- CHAT nurse sessions
- 'Toilet pass' to release students to access help when needed
- Referrals to external agencies

Staff are expected to build trusted relationships with and work in the best interests of children in line with the Trust's Safeguarding Statement, and recognise, respond and report concerns as outlined in the Staff Safeguarding Concerns: Recognise, Respond, Report section of his policy.

The Trust actively seeks children's views of safety in school through a range of activities appropriate to the setting including periodic pupil surveys and meetings with trustees and/or local governors.

#### **Parents**

The Trust recognises the importance of working together with and supporting parents to safeguard and promote the welfare of their children. This includes:

- Communicating to parents how we keep children safe in our school (including online). This policy is made available to all parents through each of the Trust's schools' websites and in paper copy on request. Each school ensures the existence of this policy is promoted at all appropriate conversations and/or events. If parents want to raise concerns or complaints about how the Trust keeps their children safe; they can do this using the Complaints Policy which is available on the Trust's and schools' website.
- Actively seeking parent views of safety in school through periodic parent surveys, events involving parents and meetings with trustees and/or local governors.
- Encouraging parents to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. Staff are expected to respond to any parents who raises worries or concerns to them either about their child(ren) or others in line with Staff Safeguarding Concerns: Recognise, Respond, Report section of this policy.
- Ensuring, through the DSLs, that schools work with parents to offer and enable support for children and their families; taking action to safeguard and promote their welfare (see DSL Response) in line with the local arrangements in the Local Authority where they live.
- Ensuring that parents are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority where they live and/or Enforcement Agencies. We do this by explain how you let parents know.
- Providing parents with regular information, guidance and external support available to them through a range of methods depending on the school setting including newsletters; specific pages on the website; running sessions for parents; signposting.

### **Other Agencies/Partnerships**

As the Trust operates in Shropshire, it engages and co-operates with the local safeguarding arrangements. The Trust's local safeguarding partnership is the [Shropshire Safeguarding Community Partnership](#) (SSCP). The Trust also engages and co-operates with other Local Authorities (e.g. Telford and Wrekin), depending on where a pupil lives. The Trust engages and co-operates by:

- Ensuring the Trust effectively safeguards and promotes the welfare of children living in Shropshire in line with the DfE's Working together to safeguard children and the Shropshire Safeguarding Community Partnership local criteria for action and assessment; as outlined in the SSCP Threshold Document. Where children do not live in Shropshire but attends a Trust's school; the Trust will work in line with the relevant local arrangements in their home area.
- Ensuring the Trust works with other agencies and comply with other pieces of relevant statutory guidance in safeguarding children potentially at greater risk of harm.
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners.
- Working closely with Shropshire Council Learning and Skills Services and other Shropshire Council Services/partnerships to ensure high quality education and support to children in Shropshire is provided.
- Participating in the local [Operation Encompass Protocol](#); an arrangement where police notify schools when a child who attends their school may have been subject or witness to police-attended incidents of domestic abuse. This enables the Trust to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of the Trust's



participation in Operation Encompass (the letter to send to parents can be found at [School Operation Encompass – Shropshire Learning Gateway \(shropshirelq.net\)](https://www.shropshirelearninggateway.net)).

## Teaching Children How to Keep Safe

The Trust recognises that educating children in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. There is a clear set of values and standards the provide opportunities for children to learn how to keep themselves and others safe; that are demonstrated and reinforced throughout school life and underpinned through -

- The Trust's Safeguarding Statement
- Behaviour/Anti-Bullying Procedure
- Preventing Radicalisation
- The Trust's approach to Online Safety
- The Trust's Personal Social Health and Education and Computing curriculum and policies including the Relationship, Sex and Health Education (RSHE) Policy. Schools' RSHE programme is developed to be fully inclusive of all ages and stages of development and consideration of children's needs including children potentially at greater risk of harm; and addresses issues as outlined Keeping Children Safe in Education 2023; Part 2, page 34, paragraph 131.

The DSL, RSHE lead and other key members of the SLT (such as computing, Mental Health and SENDCo) will work collaboratively to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in a Trust school.

## Online Safety

The use of information and communication technology (ICT); is a vital part of the everyday functioning of life in the Trust's schools. The Trust also recognises the important role ICT plays in the lives of children and their families.

Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in school when using internet enabled technology; which are summarised in the following categories:

- **content:** being exposed to illegal, inappropriate, or harmful content.
- **contact:** being subjected to harmful online interaction with other users.
- **conduct:** online behaviour that increases the likelihood of, or causes, harm to children or others.
- **commerce:** illegal, inappropriate, or harmful online commercial activities that can compromise the health and wellbeing or security of children or others.

The Trust adopts a whole trust approach to online safety which aims to safeguard and educate children and their families, staff, visitors, trustees, and local governors the use and management of ICT (including the use of camera enabled; mobile and personal devices and the ICT systems in place). The Trust's Online Safety policies outlines the approach.

Within St Martins School all staff, pupils and visitors are expected to adhere to the policy that mobile phones and camera enabled devices are not to be used. Pupils are permitted to carry personal devices though they should not be in use or turned on. Upon sign-in to site, all visitors

and Local Governors are informed/reminded of this policy. Staff may make use of personal devices strictly within child-free spaces such as the staff room.

Use of school ICT facilities (including PCs, laptops and tablets) is monitored through supervising class teacher and through filtering and monitoring software.

Filtering and monitoring systems monitor searches and attempts to gain access to restricted websites. More information can be found in the linked document Filtering and Monitoring Procedures.

Staff monitor usage within lessons to ensure permitted tools such as Teams are used appropriately, maintaining safe and respectful relationships and protecting pupils from child-on-child abuse.

Where there are online safety concerns involving identified children (including child-on-child abuse); staff will follow Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Safeguarding Response sections of this policy.

Any school cyber security incidents will be reported to Action Fraud (National Fraud and Cyber Crime Reporting Centre) and, if there is a data breach this will be reported in line with our Data Protection Processes to the Information Commissioners Office. Please also see Record Keeping and Information Security.

Where children are being asked to learn online at home, we follow advice from the Department of Education; Safeguarding and remote education.

The Trust review the online safety arrangements annually to ensure the Keeping Children Safe in Education 2023 online safety standards (including the digital standards for filtering and monitoring and cyber security) are met. Any risks arising from the reviews are clearly recorded as part of each school's evaluation and improvement action planning processes.

All staff, senior leaders, trustees and local governors are appropriately trained to enable them to ensure effective online safety arrangements. The Trust will respond to online safety incidents which indicate safeguarding concerns in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

## **Preventing Radicalisation**

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015; places a duty on schools and registered childcare providers to have due regard to the need to prevent people from being drawn into terrorism.

The Trust has a Preventing Extremism and Radicalisation Policy in place which outlines how the Trust fulfil this duty. This is available on request from each Trust school.

The Trust regularly reviews the adherence to the Prevent Duty. Any actions arising from the assessment are included in our school evaluation and improvement action planning processes.

All staff, senior leaders, trustees and local governors are appropriately trained (see Appendix A Professional Development and Support Minimum Training Requirements) to enable them to ensure that all children, particularly those who may be susceptible to extremist ideology and radicalisation are effectively safeguarded. The Trust responds to children who are identified as being susceptible to an extremist ideology in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

## **Children Potentially at Greater Risk of Harm**

The Trust recognises that whilst all children should be protected, some groups of children are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a child falls into multiple groups above; this potentially further increases their vulnerability.

### **Children Who Need a Social Worker (Child in Need and Child Protection Plans).**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or complex family circumstances. A child's experiences of adversity and/or trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

At St Martins School, safeguarding concerns are raised using a Multi-Agency Referral Form following on from a telephone call with COMPASS, recommendations will be sent to us via email/telephone as to next steps. These may be a visit from a social worker or signposting towards another agency.

Student Support Service managers sit on Oswestry Disruption Meetings (periodically held throughout the year) which discuss young people and adults of concern in the area.

The School facilitates meetings for young people and their families with school and/or external agencies.

### **Looked After Children and Previously Looked After Children.**

The most common reason for children becoming looked after is as a result of abuse and/or neglect; as well as/or other significant complexities or adversity in their and their family's life. All schools within the Trust ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements. All Trust schools have an appointed designated teacher who works with the local authority to promote the educational achievement of registered pupils who are looked after in line with.

At St Martins School the designated teacher is Katherine Mooney and LAC coordinator is Angela Herbert.

Please also refer to the DfE [statutory guidance - Designated teacher for looked-after and previously looked-after children](#)

### **Children Who are Absent from Education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect or child exploitation; as well as other needs. The Trust's response to persistently absent pupils and children who are absent

from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

Please refer to each school's Attendance Policy for further information about the Trust's process and procedures relating to absence.

The Trust refers to and uses Statutory Guidance on [Children missing education](#) to ensure we comply with our duties regarding children missing education. This includes notifying the Local Authority in line with the [Shropshire Council Children missing education](#) or the pupil's home Local Authority process when removing a child from the school roll at standard and non-standard transition points.

### **Children Who are Electively Home Educated.**

Many home educated children have an overwhelmingly positive learning experience. The Trust would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

St Martins School, on receipt of written confirmation from a parent that they wish to withdraw their child would inform the local authority in line with [DfE Elective home education guidance](#) and Shropshire Council [Elective home education](#) processes and protocols. In addition to this, the school's EWO will be informed of the family's intention and arrange a home visit to ensure this route is believed to be in the best interests of the child. Should there be any pre-existing or newly identified safeguarding concerns external agencies would duly be informed.

### **Children Requiring Mental Health Support**

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. Children who have mental health needs will often need early help or support to avoid their safety and welfare being compromised.

Each Trust school has a senior mental health lead who is a member of/ supported by the senior leadership team. At St Martins School the mental health lead is Mandi Jones (DSL). Wherever possible close working with a parent/family is encouraged to ensure the best possible outcomes for the child. This may be work within school or referral to an external agency.

Pupils which self-refer to Student Support Services are advised of pathways for support. The strategies for support include:

- Toilet pass (to attend Student Support Services at the point of need)
- Kooth card
- In school interventions such as ELSA

Pupils which we may feel would benefit from additional support with mental health issues may be identified by teaching staff, support staff and peers. Concerns may be raised in person, through indicating factors such as friendship issues, deterioration in attendance patterns, a change in behaviour patterns in and around school or external trauma such as bereavement or changes in home life setting.

Pupils who may be reported by parent/carer to be experiencing mental health difficulties this may become apparent with behaviours at home, a reluctance to come into school, or a change in eating and sleeping habits. Conversations with caregivers over the telephone, or preferably in person are valued at St Martins School in developing high quality, trusting relationships which offer broad support for pupils.

Referrals from staff which may be querying mental health issues use CPOMS to flag concerns. This will be directed to a named member of staff Student Support Services which creates clear escalation steps and accountability. Potential escalation steps may include:

- Referral to school nurse
- Trailblazers
- Parent to contact GP for referral to BeeU/CAMHS

[Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK](https://www.gov.uk/government/news/promoting-and-supporting-mental-health-and-wellbeing-in-schools-and-colleges)  
([www.gov.uk](https://www.gov.uk))

### **Children with Special Education Needs Disabilities or other Health Issues.**

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline.

The Trust recognises that additional barriers can exist when recognising abuse and neglect in this group of children (e.g. assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration).

At St Martins School additional pastoral support can be accessed in a number of ways. Pupils who may have more acute needs following Adverse Childhood Experiences, increased vulnerability or those children with SEND needs (diagnosed or otherwise) may seek help through Student Support Services or the SEND team in accordance with the trust network built up for each individual child and the nature of their need.

Pupils may be issued with a pass to leave lesson in order to access drop-in support through Student Support Services, or may seek to use connections with members of the SEND team with which they may have a close working relationship with (the 'bungalow' may act as a 'safe space' in order to gain necessary support.

Weekly interventions meetings are held (Head, deputies, Senior DSL and SENCo) to discuss the needs of vulnerable students, students identified as demonstrating need through communicated concerns (via pupil, teaching staff, support staff or parent), behavioural concerns or in-class attitudes towards peers or towards learning. Holistic discussion surrounding needs will lead to chosen support pathways for pupils which is tailored to the requirements of individual pupils.

Some pupils with acute SEMH concerns may experience some periods of time in which access to school is a specific challenge. Where supported by services (BeeU/CAMHS) pupils may require adaptations to their curriculum which may allow for a change in working environment. This may be supported with some use of Alternative Provision (eg LifeShed or TMBSS) or some time working at home using Teams to maintain communication with teaching and support staff and access to digital learning platforms. Home visits will regularly be made to maintain contact and safeguard individuals.

*“Children unable to attend school because of health needs should be able to access suitable and flexible education appropriate to their needs. The use of electronic media – such as ‘virtual classrooms’, learning platforms and so on – can provide access to a broader curriculum”.*

(Ensuring a good education for children who cannot attend school because of health needs section 10.40)

### **Children Who are Lesbian, Gay, Bi or Trans (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

At St Martins School, pupils who belong to the LGBT community are supported through peer supported groups which allow safe spaces for communicating worries, concerns and offer a support network which is non-judgemental.

Within PSE and in the comprehensive tutorial programme the broad spectrum of people who sit within the LGBT community and the challenges of those therein, or the families and friends of this group of people are explored.

There is a zero-tolerance approach to any prejudice or child-on-child abuse which seeks to exploit these differences in people in school or the wider community.

Where behaviours fall short of the expectations of mutual respect pupils are encouraged (and feel free to do so) to report any abuse they encounter.

### **Child-on-Child Abuse**

As set out in the Trust’s Safeguarding Statement; the Trust will not tolerate the abuse of children. This includes where children abuse other children (child-on-child abuse) or use words or actions which downplay or could (if not responded to) lead to abuse.

The Trust works to ensure that no child-on-child abuse takes place in its schools. However, the Trust understands that children telling staff that they are experiencing abuse from other children cannot be relied on. Staff should understand that even if there are no reports in school, this does not mean child-on-child abuse is not happening. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their Professional Development and Supervision, which do not just rely upon children telling someone. Staff are expected to follow our Appendix D: Child-on-Child Abuse Procedures

Each of the Trust’s schools monitor patterns of child-on-child incidents including those involving abuse, to ensure that schools are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps schools to continue to prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and responses to it are reported to and overseen by each school’s LGB.

## Staff Safeguarding Concerns: Recognise, Respond, Report

### Recognise

#### **Be alert and curious!**

Pay attention to possible signs or indicators of abuse from the child or others either from your own observation or what the child/others tell you:

**Appearance**

**Behaviour**

**Communication.**

Do not just rely on a child telling you (there are lots of reasons why they won't)

Any child in any family could become a victim of abuse. Abuse and safeguarding issues are complex; and can often involve a child experiencing multiple issues or types of abuse.

Staff should always maintain the attitude that abuse “could happen here”. Staff should be particularly alert to Children potentially at greater risk of harm and vigilant in identifying the signs and indicators which could indicate a concern that a child is being or could be at risk of abuse.

As well as maintaining their Professional development and accessing support; staff can remind themselves of the signs and indicators of abuse and safeguarding issues by referring to: [Keeping Children Safe in Education 2023](#): Part 1 and Annex B. and [SSCP - Contacts and Definitions](#).

Signs and indicators of concern may be evident in spaces and places where children spend time (including when online). They may be present in the child or others around them (including adults or children); in their:

- Appearance
- Behaviour
- Communication

Signs and indicators can be recognised by staff through:

- **Concerns shared directly by a child:** Staff must not rely on children telling them they are experiencing abuse. Children may not recognise; feel ready; know how to or be able to communicate concerns or worries. Staff must therefore act in accordance with the Trust's Safeguarding Statement; work in partnership and use professional curiosity and skills in developing trusted and supportive relationships in their everyday work with children.
- **Observations:** In person or online (including online behaviour in school) of a child or someone else (for example a parent, someone working or visiting the school). Concerns shared by others: either verbally or in written communications. This could be parents; other children; other staff members or other adults who may be working in or with the school or individual children.
- **Other systems in place:** For example, online filtering and monitoring or information from other agencies through working in partnership etc.

There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse. Signs and indicators could be present for a variety of reasons as well as abuse (for example other family circumstances; health or learning needs); and may act as an early sign for the need for early help and support. In such circumstances, staff are still expected to respond in line with this policy.



## Respond

Ensure the immediate safety of the child potentially at risk. If there is **immediate danger**; take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and [refer child protection concerns](#))

Apply other relevant policies/procedures (e.g. behaviour; first aid; attendance, staff code of conduct and/or [Appendix B: Child-on-Child Abuse Procedures](#) as applicable).

Seek views/gather relevant information (if safe to do so).

**Remember:** Listen (don't investigate), reassure (don't promise) and explain you will be reporting the concerns.

### Immediate safety

If a child is in immediate danger; staff must take individual action as necessary to keep the child, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- If necessary; refer child protection concerns themselves (follow [Multi-agency Referral: Reporting concerns \(MARF\)](#) )
- Work in line with our Behaviour Policy and [Use of reasonable force in schools](#) guidance.
- Report any allegations of harm by adults in a position of trust or unsafe practices in school in line with the Ensuring safe staff.

### Other relevant policies/processes

Staff may need to follow other school safeguarding policies/processes (see [Linked Policies](#)) as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the child and any other children who may be at risk or involved; ensuring they act in their best interests. Where there are concerns of child-on-child abuse; [Appendix B: Child-on-Child Abuse Procedures](#) should be referred to.

### Injuries

Each of the Trust's schools request parents notify the school of any accidents or injuries to their child before attending school.

The school will make a written record of the notification along with any injuries the child may have. Should a child receive any injuries during school time; staff will follow the accident reporting and first aid procedures.

### Seek views and gather information from the child and others.

Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:

- Children (where appropriate and depending on the circumstances and their role with children);
- any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see Record Keeping and Information Security section of this policy)
- Their parents (if necessary and depending on the circumstances and their role).



Any uncertainty about seeking views should be discussed with the DSL.

Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to When Concerns are Directly Shared by a Child section below.

Views should always be sought unless it is not safe to do so. This includes where seeking views would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If needs for help and support are identified; parents and children should always be asked for their consent to share information with other organisations individuals so that help and support can be provided to them. If consent is not given; staff should follow guidance in the Recording Keeping and Information Security: Sharing Safeguarding Information with Organisations section in this policy.

Any uncertainty about seeking views should be discussed with the DSL. Decisions to share safeguarding concerns with other organisations without consent will be reported to and overseen by the DSL.

If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through their behaviour and use communication tools to help the child share their views.

At St Martins School Emotional Literacy Support Assistants can assist children in communication where verbal expressions are a barrier. With younger pupils and pupils which may encounter difficulties finding words to present feelings/concerns experiences Student Support Services managers (DSLs) can also assist with use of props, coloured cards, emotion dolls and zones of regulation.

### **When Concerns are Directly Shared by a Child**

Children are more likely to share their experiences and feelings with someone they know and feel comfortable talking to.

When children share the details of or feelings about abuse; the process of sharing can sometimes take time. Children may not share in full or give staff (and sometimes not the same staff member) pieces of information over time. When they do share, this may not always be verbally or directly; but the child may share in the appearance, behaviour or other forms of communication (refer to Recognise earlier in this section).

It takes a lot of courage for a child to share that they feel unsafe or are experiencing abuse. There are many reasons why children do not share their experiences (for example, uncertainty, shame,

experiences of discrimination, fear, denial or a lack of understanding or ability to recognise and explain their experience).

When children are sharing their concerns; staff should:

- Listen to the child. Please refer to this [NSPCC poster](#).
- Remain calm: the child may stop sharing if they feel the staff member is upset or shocked by what the child is telling them.
- Explain it can't be a secret. Staff must explain to the child that what they share has to be passed on and to who so that you can help them. Think about when to do this to make sure the child feels safe and can continue to trust you and other staff.
- Reassure and offer comfort to the child (physical touch should not be automatically offered as comfort); recognise their feelings and their courage in sharing their experience. Never deny or minimise what the child is telling you or reprimand them if they decide not to share or for not telling you before.
- Seek the child's views: use questions or communication tools that help the child to share from their own point of view. Gather information: do not investigate or assume what is happening to the child.
- Explain what will happen next. If you don't know everything that is going to be done, tell the child that you will make sure that they are kept informed.
- Report and record the conversation immediately as outlined in the Reporting concerns section.
- Seek support if you feel distressed from your line manager or a member of the Safeguarding team. Support can also be sought from members of the Trust's HR team or the free NOSS counselling service.

## Report

**Report in person** to the DSL as soon as possible.

**Record** your concerns, decisions, actions and outcomes on the safeguarding recording system.

**If concerned about a member of staff or someone else in the school;** report in line with **Ensuring safe staff**.

### Report to DSL

All safeguarding concerns must be reported to the DSL as soon as they are recognised and after the initial response to the child and others. Staff are expected to verbally report their concerns to the DSL.

Where concerns involve an allegation of harm or a low-level concern about someone working in or at the school; staff must follow **Ensuring safe staff**.

### Record concerns

At St Martins School, all safeguarding concerns must be recorded by the staff member in writing via the CPOMS platform. This process allows for secure management of information which is directed to key Student Support Services (DSLs). Access to sensitive and safeguarding information is tightly controlled, limited to DSLs alone and required two-factor authentication to gain access at the time of logging in (without this staff may access the platform in order to log incidents only).

Where physical injuries to a child form part of the evidence of the concern; staff will record information about the physical injuries observed on a Body Map. Body Maps are available on CPOMS next to the incident recording and should be used if appropriate. (Body Maps are available as part of the [Compass Multi-Agency Referral Form](#) or the Child Protection Body Map in the [West Midlands Physical Abuse Procedures](#)).

Each safeguarding concern record should include:

- a clear and comprehensive summary of the concern.
- details of how the concern was followed up and resolved.
- any action taken, decisions reached and the outcome.

If staff are unsure of the recording requirements staff should seek advice from the DSL.

## DSL Response

Safeguarding concerns can be raised by staff as above; but may also be raised to the DSL by:

- Children, parents, or visitors to the school.
- Other agencies (see Working in Partnership section of this policy)
- The school's ICT filtering and monitoring systems.
- Visitors to the school are signposted to DSLs in order to raise such concerns.
- Concerns from parents may be raised by telephone, email or meeting request.

The DSL will:

### Consider and Assess the Concern.

Review the information reported; gather any further information as necessary; including conducting a risk and needs assessment if necessary. The DSL will use and refer to the following:

- [Keeping Children Safe in Education 2023](#)
- [SSCP Threshold Document](#)
- Other [relevant local tools and pathways](#) (West Midlands Procedures)
- If applicable Appendix D: Child-on-Child Abuse Procedures
- [When to Call the Police Guidance for Schools](#)

### Decide on What Action to Take.

Once the concern has been considered and assessed; the DSL will decide on action(s) to be taken. They may wish to delegate actions to other members of staff, in the best interests of the child. The DSL will assist the Headteacher with decisions relating to staff in school.

In making decisions, the DSL will work in partnership with the Headteacher; relevant staff/senior leadership team in line with their Roles and Responsibilities and any other organisations as appropriate (see Working in Partnership and Record Keeping and Information Security).

Actions could include one or more of the below

- **Manage internally:** in alignment with school policies and processes including offering support to the child and their family through the school pastoral support (Universal/School Early Help) offer in a way which addresses the needs/risks identified. This may also include actions to make locations/infrastructure in school (including online) safer; adapt the curriculum to ensure the school is teaching our children how to keep safe, or Working in Partnership.

- **Offer Early Help/Targeted Early Help.** This could include offering and/or referring the child or their family enhanced or specialist support services to address the needs/risks identified in line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- **Raise concerns to Children's Social Care** in line with the [SSCP Thresholds document](#) and [relevant local tools and pathways](#).
- **Report to the Police.** If there are any concerns that a crime (including online) may have been committed by someone against or involving a child; concerns will be reported to the Police.

Where there is possible criminal behaviour by a child (including in circumstances of child-on-child abuse); we will take account of [When to call the police: guidance for schools and colleges](#).

Other local referral processes will also be followed as applicable: including referring to relevant multi-agency forums and processes as outlined in [relevant local tools and pathways](#) (e.g. to [Prevent Radicalisation](#); ensure [Online Safety](#); respond to domestic abuse: [Multi-Agency Risk Assessment Conference](#)).

### **Record Actions, Decisions, and Outcomes.**

On the child protection file and in line with [Record Keeping and Information Security](#) . This will include assessments and discussions (including meeting notes/minutes) of discussions and meetings with staff or others (see [Working in Partnership](#)).

### **Manage and Oversee any Ongoing Response.**

Once the initial actions are taken, the DSL will decide whether there is an ongoing need to actively monitor or manage the safeguarding needs of a child. Where this is decided, they will ensure that the school [works in partnership](#) with the child; parents, and any other involved agencies. This may include taking further actions (as outlined above) where concerns escalate.

The [SSCP Escalation/Resolution of Professional Disagreements Policy](#) will be used to challenge, resolve and if necessary escalate any concerns the school may have when working with other agencies in safeguarding children.

## **Linked Policies and Procedures**

Behaviour Policy  
 Staff Code of Conduct  
 Whistleblowing  
 Health & Safety  
 Allegations against staff  
 Attendance  
 RSHE  
 Complaints  
 SEND  
 Supporting Children with Medical Conditions  
 Online Safety  
 Filtering and Monitoring  
 Risk Assessments  
 Safer Recruitment

Staff Disciplinary and Dismissal  
 Staff Grievance  
 Preventing Extremism and Radicalisation  
 Data Protection

## Policy Monitoring and Review

### Monitoring

The Chief Executive Officer will monitor the outcomes and impact of this policy on an annual basis.

### Review

Member of Staff Responsible	Chief Executive Officer
Relevant Guidance/Advice/Legal Reference	<p>Legislation:  <a href="#">Education Act 2002 Section 157 (Independent schools incl Academies and CTC's)</a>  <a href="#">The Education (Independent School Standards) (England) Regulations 2003</a>          Children Act 2004          Statutory National Guidance/Standards:  <a href="#">Keeping Children Safe in Education</a> and any legislation or guidance (statutory/non-statutory) outlined or referenced within it.  <a href="#">Working Together to Safeguard Children</a> and any legislation or guidance (statutory or non-statutory) outlined or referenced within it.          Local Procedures:  <a href="#">West Midlands Safeguarding Children Procedures</a>  <a href="#">Shropshire Safeguarding Community Partnership (SSCP) Children's Threshold Document</a>  <a href="#">Shropshire Safeguarding Community Partnership Allegations about staff/volunteers protocol</a>  <a href="#">Shropshire Schools Operation Encompass Protocol</a></p>
Policy Adopted By	Trust Board
Consultation	Local Governing Bodies
Date of Policy	Autumn Term 2023
Review Period	Annually
Date of Next Review	Autumn Term 2024

## Appendix A Professional Development and Support Minimum Training Requirements

### All School Staff (including Volunteers)

Activity	Frequency
Receive information on school safeguarding arrangements and procedures as outlined in KCSiE 2023 (Part 1: page 7, paragraph 13).	Induction or when arrangements/procedures are updated.
Read <a href="#">Keeping Children Safe in Education</a> (KCSiE): All Staff: Part 1; Part 5 and Annex B. Senior Leadership Team: Entire document Staff who do not work directly with children: Annex A Complete KCSiE Quiz	Induction then annually (in Autumn Term) or when updated.
Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns.	Induction and then every 3 years
Complete Prevent Awareness Training appropriate to role (see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK</a> ( <a href="http://www.gov.uk">www.gov.uk</a> ))	Induction and every 2 years.
Complete Cyber Security Training (training packages are available at: <a href="#">Cyber security training for school staff - NCSC.GOV.UK</a> and National College)	Induction and then annually
Receive regular national and local safeguarding updates (including those relating to online safety).	Termly updates will be provided by the Trust's Safeguarding consultant. This may be done via email.

### DSLs (including DDSLs)

Activity (in addition to all staff above)	Frequency
Complete Schools DSL Training to a standard as outlined in KCSiE Annex C Complete KCSiE Quiz	On induction in role and then every 2 years
Read <a href="#">Keeping Children Safe in Education</a> in its entirety.	Induction into role then annually (in Autumn Term) or when updated.

Maintain knowledge and development relating to the role of DSL (include whether DSL's complete any <a href="#">Early Help</a> /Brook Traffic Light Tool/Other relevant training)	As required, but at least annually
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### Trust Central Team (TCT)

Applies To	Activity	Frequency
All TCT staff	Receive information on each trust school's safeguarding arrangements and procedures as outlined in KCSiE 2023 (Part 1: page 7, paragraph 13). This must include a list of each school's DSLs and clear guidance on what to do if safeguarding concerns arise whilst a member of the team is working at one of the Trust's schools.	Induction and annually
All TCT staff	Read <a href="#">Keeping Children Safe in Education</a> (KCSiE): Part 1; Part 5 and Annex B. Annex A Complete KCSiE quiz	Annually
Executive Team	Read <a href="#">Keeping Children Safe in Education</a> (KCSiE): Entire document Complete KCSiE quiz	Annually
All TCT staff	Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns (see Local Authority Safeguarding in Education Training Statement <a href="#">here</a> )	Induction and then every 3 years
All TCT staff	Complete Prevent Awareness Training appropriate to role (see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a> )	Induction and every 2 years

Applies To	Activity	Frequency
All TCT staff	Complete Cyber Security Training (training packages are available at: Cyber security training for school staff - <a href="https://www.ncsc.gov.uk">NCSC.GOV.UK</a> and National College)	Induction and then annually
All TCT staff	Receive regular national and local safeguarding updates (including those relating to online safety).	Termly updates will be provided by the Trust's Safeguarding consultant. This may be done via email.
Executive Team and HR Manager	Complete Safer Recruitment training and Safer Working Practices training	Induction and every 3 years

#### Staff involved in recruitment of staff (including administration)

Activity (in addition to other relevant training as outlined above)	Frequency
Read Part 3: <a href="#">Keeping Children Safe in Education</a>	Induction into role then annually (in Autumn Term) or when updated.
Complete appropriate safer recruitment training (that is in alignment with Part 3 KCSiE)	Induction and every 3 years (or when KCSiE Part 3 is updated)

#### All Trustees and Local Governors

Activity	Frequency
Complete Governance Safeguarding Training to equip them with the knowledge to carry out their strategic roles and responsibilities.	Induction and then every 3 years.



<p>Read <a href="#">Keeping Children Safe in Education</a>  All trustees and local governors: Part 1; Part 2 and Annex B.  Chairs and Safeguarding Link Trustees and Local Governors:  Entire document  Complete KCSIE quiz</p>	<p>Induction into role then annually (in Autumn Term) or when updated).</p>
<p>Complete Cyber Security Training (training packages are available at: National College)</p>	<p>Induction and then annually</p>
<p>Complete Prevent Awareness Training (see examples of training packages at: <a href="#">The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)</a>)</p>	<p>Induction and every 2 years.</p>

## Appendix B Alternative Provision Quality Assurance Checklist

Alternative Provision Quality Assurance Checklist			
Name of alternative provision:			
Name of person completing checklist (from host school):			
All agencies and settings who place pupils at alternative provision MUST quality assure the placement. This quality assurance document must be completed prior to working with a new alternative provision and annually thereafter.			
		On file/ evidence of check	Date & Initial
1	If this quality assurance check is a review, please confirm the date of previous assurance check.		
2	Is the alternative provision registered as an independent school with the DfE? Y/N The criteria to be registered as an independent school is that; - full-time <sup>1</sup> education is provided for five or more pupils of compulsory school age Or -full-time education is provided for one or more pupils with an EHC plan or who is “looked after” by a local authority  <small>1 - There is no legal definition of what constitutes ‘full-time’ education. However, DfE would consider an institution to be providing full-time education if it is intended to provide, or does provide, all, or substantially all, of a child’s education.</small>		
3	What is the provider’s DfE number? (If applicable)		
4	Copy of signed Service Level Agreement (SLA) /contract (attached)		
5	Is there a clear governance structure within the Alternative provision? Y/N		
6	Does the referral process include the requirement for a detailed pupil profile from the host school prior to agreement of placement? Y/N		
7	Pupil’s attendance should be monitored daily. Is this included in the SLA? Y/N Copy of providers Attendance policy attached.		
8	Is there a procedure for when pupils fail to attend or the placement breaks down? Y/N		
9	Is there adequate access to resources for all pupils who access the provision? Y/N		
10	Is there inclusive practice with regards to positive behaviour management, attendance and punctuality? Y/N <ul style="list-style-type: none"> <li>• Pro-actively promote and support the regular attendance of pupils</li> <li>• Effective reward/incentive strategies to promote participation</li> </ul>		
11	Is there regular assessment and review of pupil progress? Y/N Provision agree to share weekly progress reports		
12	Are risk assessments completed for activities that pupils may undertake? Y/N (copy attached)		
13	Is there a full and clear pupil induction procedure regarding health and safety and fire evacuation? Y/N		

14	Are there robust procedures in place (including information sharing that are referenced in the SLA) to safeguard children in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N Copy of providers Safeguarding/Child protection policy attached.		
15	Has evidence of staff receiving accredited child protection training been seen? Y/N Has evidence of DSL receiving training for their role been seen? Y/N Have contact details for DSL been provided? Y/N (attached).		
16	Copy of public liability insurance document attached.		
17	Is there a policy for when members of staff are working alone with pupils? Y/N (copy attached)		
18	Does the provider have an online safety policy in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N (copy attached)		
19	Copy of health and safety policy attached.		
20	Has written confirmation from the provider that staff vetting checks have been undertaken been received? Y/N Checks include; <ul style="list-style-type: none"> <li>• an identity check;</li> <li>• a barred list check;</li> <li>• an enhanced DBS check/certificate;</li> <li>• a prohibition from teaching check;</li> <li>• further checks on people who have lived or worked outside the UK</li> <li>• a check of professional qualifications, where required; and</li> <li>• a check to establish the person's right to work in the United Kingdom.</li> </ul> Has confirmation of these checks been added to the Single Central Record?		
21	Is there a Designated First Aid Officer and suitable equipment available? Y/N <ul style="list-style-type: none"> <li>• Qualified First Aiders identified</li> <li>• Recording system for accidents including informing host school and home</li> <li>• Historical or current RIDDOR investigations</li> <li>• Evidence of full first aid kit</li> </ul>		
22	Has confirmation been received from the provider that a representative will attend or contribute to multi-agency meetings when necessary? Y/N		
<b>Action Plan</b> If 'no' is answered to any of the questions in Part 2 an action plan must be formulated to obtain information			
Action reference number.	Area for improvement	Intended action	

Signed by host school:

Date:

Signed by Alternative Provision:

Date:

## Appendix C: File Transfer Documentation

### PART 1: To be completed by sending / transferring setting, school or college.

NAME OF CHILD:	
DOB:	
NAME OF SCHOOL/SETTING SENDING CP FILE:	
ADDRESS OF SCHOOL / SETTING SENDING CP FILE:	
METHOD OF DELIVERY:	BY HAND    SECURE POST    ELECTRONICALLY
DATE FILE SENT:	
NAME OF DSL TRANSFERRING FILE:	
NAME OF PERSON TRANFERRING TO:	
SIGNATURE:	

### PART 2: To be completed by receiving setting, school or college.

NAME OF SCHOOL / SETTING RECEIVING FILE:	
ADDRESS OF SCHOOL / SETTING RECEIVING FILE:	
DATE RECEIVED:	
NAME OF PERSON RECEIVING FILE:	
DATE CONFIRMATION OF RECEIPT SENT:	
SIGNATURE:	

*Receiving School: Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You are advised to keep a copy for your own reference.*

## Appendix D: Child-on-child Abuse Procedures

The Trust aims to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

- Expecting all staff, trustees and local governors in the Trust's school to ensure they are adhering to and promoting the commitments made in the Trust's Safeguarding Statement.
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that DSLs and other relevant staff have completed training in how to assess and respond to child-on-child abuse. For further detail; please refer to Professional Development and Support.
- Being clear how children are expected to behave towards one another. The schools' Behaviour Policy outlines these expectations; how the school will support children to understand and fulfil them; and how schools will prevent and respond to behaviour which falls below expected standards. Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring teaching children how to keep safe is implemented.
- Making sure that children who experience or are at risk of experiencing abuse from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive in their behaviour towards other children are identified, supported and safeguarded from engaging in further harmful behaviour.
- Making sure that the Trust is taking positive action to ensure that children who are more vulnerable to child-on-child abuse are not disproportionately impacted by child-on-child abuse in school.

### What is Child-on-Child Abuse?

Child-on-child abuse:

- Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.
- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context; child-on-child abuse can take place in spaces and at times of the school day where children are less likely to be supervised. Where child-on-child abuse is taking place outside of school (including online) this abuse can also continue and have an impact on a child when they are at school.
- Can be defined in different ways (examples are outlined in Keeping Children Safe in Education 2023: Part 1; pages 12-13 and Part 5; pages 106-109).
- A child may experience one or multiple types of child-on-child abuse at the same time.

### Children Who are More Vulnerable to Child-on-Child Abuse

Please read this alongside Children Potentially at Greater Risk of Harm section of this policy.

Children who are perceived to be different to others can be particularly vulnerable to child-on-child abuse. When children are abused by other children; there is more often than not a misuse of power or privilege by the child(ren) causing harm. This can have a significant impact on the emotional development and mental wellbeing of the child who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

Children who harm others may have additional or complex needs. Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience<sup>2</sup> in their life. Children who harm other children may have power or privilege over a child(ren) they are causing harm to but can also be powerless or vulnerable in other part of their lives.

Child-on-child abuse is harmful to all children involved.

Evidence<sup>3</sup> indicates that children from particular groups are more vulnerable to child-on-child abuse. This includes children who:

- Have special education needs and/or disabilities and/or health issues.
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). These children are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias<sup>4</sup>.
- Identify as Lesbian Gay, Bi-Sexual; Transgender (LGBT). These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse.
- Are female. Girls are more vulnerable to harmful sexual behaviour and abuse in intimate personal relationships.
- Are male. Boys and are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

Where a child has several differences and would fall into multiple groups above; this further increases their vulnerability.

### **When is child-on-child behaviour considered abusive?**

The Trust recognises the importance of distinguishing between behaviour that is developmentally appropriate, problematic, or harmful. Harmful behaviour is abusive. It can also (but not always) include physical abuse.

In considering whether behaviour is abusive; staff should consider:

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<sup>2</sup> See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

<sup>3</sup> Evidence sources:

- Keeping Children Safe in Education 2023; Part 2: Children potentially at greater risk of harm.
- [Prevalence of bullying \(anti-bullyingalliance.org.uk\)](#).
- [Safeguarding d/Deaf and disabled children | NSPCC Learning](#);
- [Safeguarding children from Black, Asian and minoritised ethnic communities | NSPCC Learning](#);
- [Safeguarding LGBTQ+ children and young people | NSPCC Learning](#);
- [Spotlight #3: Young people and domestic abuse | Safelives](#).
- [Addressing child-on-child abuse: a resource for schools and colleges \(farrer.co.uk\)](#)

<sup>4</sup> [Adultification bias within child protection and safeguarding \(justiceinspectores.gov.uk\)](#)

- The impact on the child(ren) affected by the behaviour: Any behaviour that is likely to have an impact on a child's physical and emotional health and development should be considered potentially harmful. The greater the impact of the behaviour on the child's health and development; the greater level of harm caused to them.

The needs and circumstances of the child who is identified as being potentially harmed should always be considered. This should also include ensuring that their wishes and feelings are sought and recognised in considering the impact upon them.

Even where children do not/are not able to express their wishes and feelings; staff should also pay attention to other potential signs/indicators of abuse (refer to Staff Safeguarding Concerns: Recognise, Respond, Report section in this Policy)

Children raising child-on-child concerns either for themselves or others will be taken seriously and never be given an impression they are creating a problem.

- The behaviour of the child(ren) who is/are causing harm: It is important to consider the behaviour of children on a continuum; taking account of their age and level of development; as well as any other needs or circumstances that may influence their behaviour (for example a child who is causing harm to other children could be an indication that they have unmet needs; or may be a sign or indicator that they are experiencing abuse, or are experiencing some other adverse experience which is having an impact upon them).

Features of abusive behaviours can include:

- A pattern of similar behaviour (this can include lower-level problematic behaviours that have occurred over time that have begun to increase in frequency or seriousness)
- A misuse of power over the child who is being harmed. (please also see children who are more vulnerable above).
- Victimisation of the child who is being harmed. This could also include circumstances where the child causing harm is supported or joined by other children.
- Intrusive behaviour; not considering or enabling the child being harmed to freely agree and/or consent to the behaviour.
- An element of control; coercion and/or force.
- Physical/sexual violence (this does not always have to be present; but where it is so would heighten the level of concern).
- Evidence that a child is actively seeking, planning or getting enjoyment or pleasure from causing harm would also heighten concern.

### **The Trust's response to child-on-child abuse**

In most instances, the Trust will use school's Behaviour Policy to manage the conduct of children towards each other. However, where behaviour is considered abusive or indicates safeguarding concerns; then staff will also need to raise such concerns to the DSL in line with the Staff Safeguarding Concerns: Recognise, Respond, Report section of this policy.

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<sup>5</sup> Adapted from Hackett Continuum as described in [Understanding sexualised behaviour in children | NSPCC Learning](#). When drawing on Hackett's continuum, in order to assess the seriousness of other (i.e. non Harmful Sexual Behaviour) alleged behaviour, it should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider (see [Farrer and Co \(2022\) page 35-36](#))

In responding to any concern of child-on-child abuse; schools will take account of:

- Part 5 Keeping Children Safe in Education 2023.
- [Use of reasonable force in schools](#)
- [Searching, screening and confiscation at school](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [When to call the police: guidance for schools and colleges.](#)

### **Risk and needs assessment.**

All staff will immediately consider how best to support and protect all children involved in child-on-child abuse incidents; ensuring they act in their best interests.

The school may deem it necessary to complete a formally recorded risk and needs assessment for all children involved in child-on-child abuse incidents. The decision to complete a formal risk assessment will be taken by the DSL. This formal assessment will always take place where there is evidence of violent or abusive behaviour.

The purpose of the risk and needs assessment is to safeguard all children involved (including children who may not be at the school, such as siblings) and will clearly outline the strategies to be put in place to mitigate risk and address any identified needs.

The risk and needs assessment will be completed; taking account of information from all key staff (and relevant involved professionals) working with the children, as well as their parents/carers. It will also include the views and feelings of the children; where this is safe and appropriate to do so.

The risk assessment will be shared with all staff and relevant involved professionals who work with the children; as well as parents and carers. It will respond to any changes in behaviour and will be regularly updated and evaluated to assess impact.

### **Response**

The parents/carers of **all involved children** will be notified of and involved in the school's response. The school will only share the details of other children to parents/carers who do not have parental responsibility for them where the school has consent to do so or where a decision has been taken to share to enable them to effectively safeguard their child (please also refer to Record Keeping and Information Security section of this policy)

The risk and needs assessment will inform the response taken. The following responses will be considered; (more than one response can be considered):

- Manage internally in alignment with the school's Behaviour Policy and pastoral support offer in a way which addresses the needs/risks identified. Any sanctions imposed on the child causing harm will be proportionately balanced with any other responses (such as police involvement) and take accounts of risks and needs; as well as the ongoing impact on/risk to the child who has been harmed or others. This may also include actions to make locations/school infrastructure (including online) safer; adapt the curriculum to ensure we are Teaching Children How to Keep safe or Working in Partnership sections of this policy.
- Offer Early Help/Targeted Early Help. This could include offering and/or referring any child involved to enhanced or specialist support services to address the needs/risks identified in



- line with the [SSCP Thresholds document](#) and locally available provision. Any referrals for support will require parental consent and will take account of children's wishes and feelings.
- Raise concerns to Children's Social Care in line with the [SSCP Thresholds document](#).
  - Report to the Police. The school will take account of [When to call the police: guidance for schools and colleges](#).

### **Recording and monitoring**

All child-on-child abuse concerns and responses will be recorded and stored on the child protection files of all involved children (refer to Record Keeping and Information Security section in this policy). Child-on-child incidents that do not indicate abuse or raise safeguarding concerns are recorded in line with our Behaviour Policy on what system.