



Mission

Impact Education Multi Academy Trust is on a mission to improve the life chances of children and young people and improve social mobility for the disadvantaged.

Vision

*A Trust **where hearts and minds connect**; values-driven partners who work collaboratively to ensure education impacts positively on students, families, communities, and staff.*

Impact is a values-driven organisation with the belief that collaborative leadership and strong partnership development can lead to significant positive impact on the quality of education. We believe that this can happen without schools losing their own identity.

We are an organisation where Hearts and Minds Connect and have developed a culture and ethos that ensures children and young people achieve the very best outcomes whilst developing a life-long love of learning. We have high expectations academically, but we also place a great emphasis on positive attitudes to learning and building effective relationships with others. Our children and young people are encouraged to develop themselves as fully rounded, emotionally intelligent individuals. Our people are highly valued and encouraged to take advantage of the wealth of developmental opportunities across the Trust.

**The following policy must be read in conjunction with the *Staff Policy Handbook*
15th June 2020
of the IMPACT Education Multi-Academy Trust.**

This policy applies to all adults, including volunteers, working in or on behalf of the school.

The following policies can be found in the *Staff Policy Handbook for the IMPACT Education Multi-Academy Trust*:

**Recruitment Policy. P.6-19.
Staff code of conduct. P.36-41.
Disciplinary Procedure. Pages 42-51.
Anti-Harassment and Bullying Policy. P.69-71.
Social Media Policy. P.84-86.
Whistleblowing. P.87-92.
GDPR. P.192-208.
CCTV and Monitoring. P.209-217.**



The Halifax Academy

Safeguarding and Child Protection Policy and Procedures

1st September 2021

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At The Halifax Academy, we believe that as the current *Keeping Children Safe in Education (KCSIE)* states (page 7):

1. "Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children.

2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance 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.

Children includes everyone under the age of 18."

5. We believe that therefore:

- Schools play a key role in the prevention of abuse.
- All children have the right to be protected from harm.
- Children need support which matches their individual needs, including those who may have experienced abuse.

School Contacts

Designated Safeguarding Lead (DSL)	Jo George
Deputy Designated Safeguarding Lead (Deputy DSL)	Tracey King Sue Keasey
Other staff trained to DSL level	Caroline Eastwood Richard Shaw Sammia Nazir Kate Bell Ghizala Saddique
Designated Practitioner with responsibility for Safeguarding in Early Years	Sue Keasey
Designated Looked after Children Lead	Jo George
Wellbeing Lead	Jo George
Prevent Lead	Jo George
Headteacher	Matt Perry
Governor/Trustee Contacts	
CEO	Mick Kay
Chair of Governors	Phil Shepherd
Governor responsible for Safeguarding	Diane Cothey
Trustee responsible for Safeguarding	Ashley Lord
Local Authority Contacts/ Safeguarding Partners: Our school follows the safeguarding protocols and procedures of our Safeguarding Partners	
Local safeguarding children board	Calderdale
Local authority children's social care referral team	Calderdale MAST
The Designated Officer for child protection (sometimes referred to as the LADO)	Natalie Alleyne
Local authority Prevent Lead	Assia Hussain
Local authority's out of hours social care contact numbers	01422 288000
Police	
Local Police Emergency	999
Local Police non-emergency	101
Location of local authority safeguarding and child protection documents in school	
Local authority documents, e.g. thresholds, referral forms and related guidance can be found:	Safeguarding office
National Contacts	
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: help@nspcc.org.uk
NSPCC Text line	88858

Section 1: Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

This policy also complies with our Trust funding agreement and articles of association.

Safeguarding and child protection is everyone's responsibility.

This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. This information can be found here:

<https://safeguarding.calderdale.gov.uk/professionals/safeguarding-children/calderdale-safeguarding-children-partnership/>

Julie Jenkins - Director of Children's Services

Penny Woodhead - NHS Calderdale Clinical Commissioning Group (CCG)

Sarah Baker - West Yorkshire Police

Our policy and procedures also apply to extended school and off-site activities.

Section 2: Definitions:

Safeguarding and promoting the welfare of children means:

- 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 part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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

Sharing of Nudes and Semi-nudes (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

Section 3: Children

Children includes everyone under the age of 18.

Section 4: Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (Our SEND policy is available on the school website)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are children looked after (CLA) or previously looked after (PCLA)

Section 5: Roles and Responsibilities

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

Section 5.1: All staff

All staff will read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff policy handbook and code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, the online safety policy, and the safeguarding response to children who go missing from education. This information can be located on the school website and requested from the school office.
- The fact that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of this environment. Staff know that they should consider whether children are at risk of abuse or exploitation in situations outside their families (e.g., sexual exploitation, criminal exploitation, serious youth violence).
- The early help process (sometimes known as the common assessment framework or TAF (Team around the family) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play, what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization.

Staff should speak to a DSL about their initial concerns and an early help referral will be conducted if necessary. Guidance, forms, and support can be found at:
<https://www.calderdale.gov.uk/v2/residents/education-and-learning/parental-support/calderdale-early-intervention/early-help-pathway>

Section 5.2: The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team.

Our DSL is Jo George (Associate Assistant Headteacher).

The DSL takes lead responsibility for child protection and wider safeguarding in the school.

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

When the DSL is absent or not available, the deputy DSLs (Tracey King, phases 3-5 and Sue Keasey, phases 1-3) will act as cover.

The DSL or Deputy DSL can be contacted out of hours by emailing:

jgeorge@thehalifaxacademy.org

tking@thehalifaxacademy.org

skeasey@thehalifaxacademy.org

or by calling: 07719 527852

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description.

Section 5.3: The Local Governing Board

The local governing board (LGB) will approve this policy at each review, ensure it complies with the law and hold the Headteacher to account for its implementation.

The local governing board will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board.

Diane Cothey is the Governor responsible for safeguarding. This is always a different person from the DSL.

Pat McDermott is the nominated Trustee for safeguarding.

The Chair of Governors will act as the 'case manager' if an allegation of abuse is made against the Headteacher, where appropriate.

All governors will read Keeping Children Safe in Education in its entirety and sign an annual declaration to say that they have read and understood it.

Governors are supported with safeguarding updates and/or additional training through half-termly governor meetings. Governors are also openly invited to any training days/events that take place for staff at The Halifax Academy.

Diane Cothey (governor) meets Jo George (DSL) at least once per year to discuss safeguarding updates, training, and provision.

Section 5.4: The Headteacher

The Headteacher is responsible for:

- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate. (Please refer to the Staff Code of Conduct and Staff Policy Handbook and the THA Managing Allegations Policy).
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

Section 6: Confidentiality

A detailed description of how our school uses any personal information and data that we hold about students and their parents/carers is in the privacy notice for students and the privacy notice for parents/carers.

You should note that:

- **Timely** information sharing is essential to effective safeguarding
- **Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children**
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- **Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests**
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)

- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

*** See Staff Policy Handbook for IMPACT Education MAT; Part 5. Data Protection and personal data. Pages 192-208**

Section 7: Recognising Abuse and Taking Action

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

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

Section 7.1: If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Our local procedures for making a referral, as per the arrangements put in place by our safeguarding partners are as follows;

<https://safeguarding.calderdale.gov.uk/report-concerns/>

West Yorkshire Police

<https://www.westyorkshire.police.uk/report-it> or ring 999 if it is an emergency

Calderdale and Kirklees NHS Trust – School Nurse Team

<https://www.kirkleessafeguardingchildren.co.uk/>

To contact Calderdale Council direct to report any concerns:

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

Section 7.2: If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and **do not ask leading questions.**
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it.

- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

Section 7.3: If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education’s Keeping Children Safe in Education 2021 explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in **appendix 4**.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18 must immediately report this to the police, personally**. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children’s social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

<https://www.westyorkshire.police.uk/advice/child-protection/female-genital-mutilation/female-genital-mutilation>

Section 7.4: If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page **16** illustrates the procedure to follow if you have any concerns about a child’s welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken.

Speak to a member of the senior leadership team and/or take advice from local authority children’s social care.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Section 7.4a: Early Help

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

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

<https://www.calderdale.gov.uk/v2/residents/schools-and-children/parental-support/early-intervention-support>

Section 7.4b: Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

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

https://westyorkscb.proceduresonline.com/p_referr.html

https://westyorkscb.proceduresonline.com/p_res_profdisag.html?zoom_highlight=escalation

Section 7.5: If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 7.4b 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

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

- Think someone is in immediate danger

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

Section 7.6: If you have concerns about Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

At The Halifax Academy possible mental health problems are identified through welfare conversations with students by our DSL/DDSLs, SENCOs and our trained mental health first aiders. Referrals to the Open Minds Partnership or to our own in-house counsellors will be made as necessary.

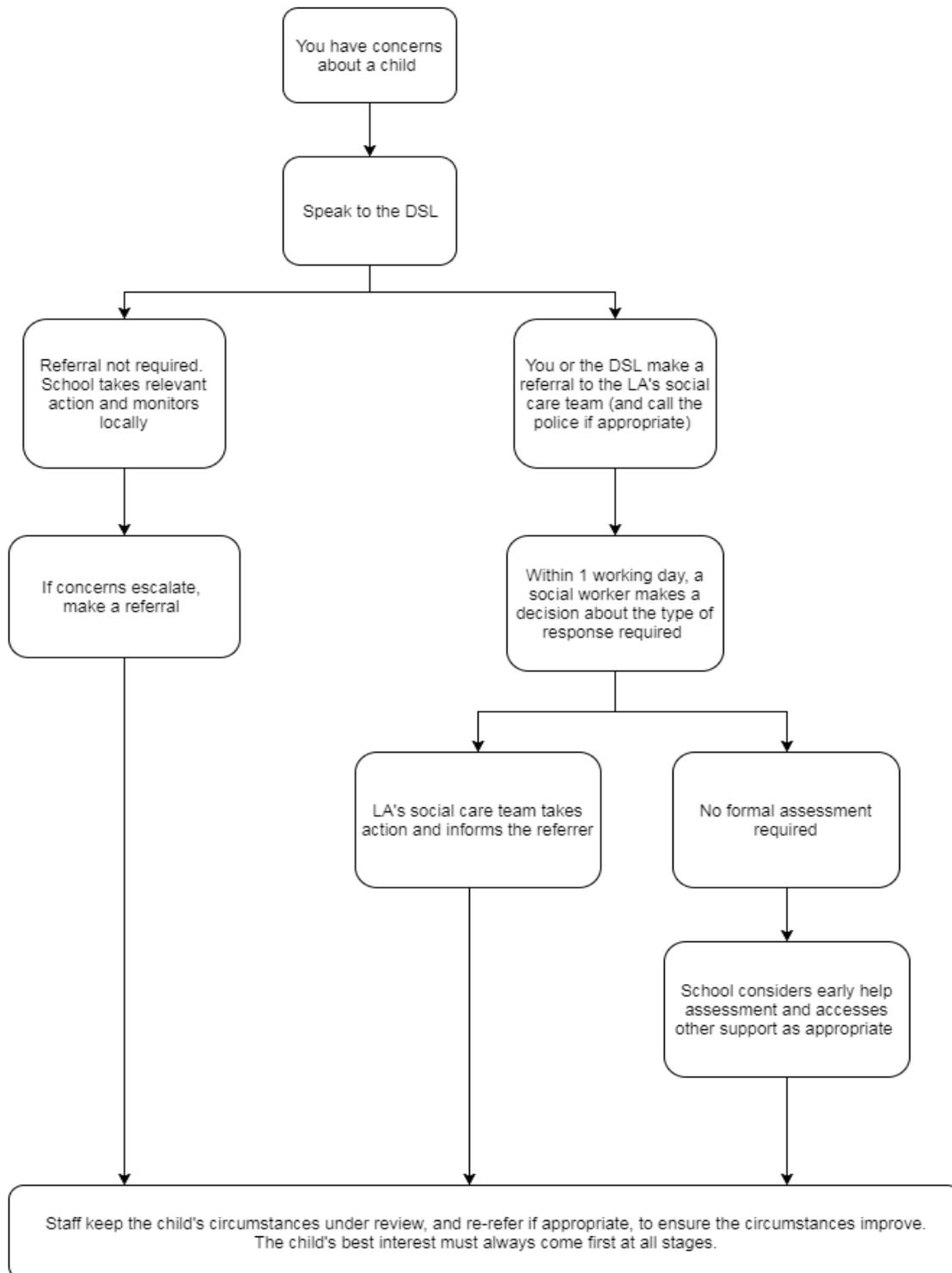
Further support can be found by referring to the Department of Education guidance on Mental health and behaviour in schools for more information.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf

Figure 1

Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note –if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



Section 7.7: Concerns about a Staff Member or Volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Headteacher.

If the concerns/allegations are about the Headteacher, speak to the Chair of Governors.

The Headteacher/Chair of Governors will then follow the procedures set out in appendix 3, if appropriate.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer, or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO). **See appendix 7 managing concerns policy for more detail.**

Section 7.8: Allegations of Peer on Peer Abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of peer-on-peer abuse (i.e., that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously. As a school we do not tolerate any form of sexual violence or sexual harassment and have **a specific peer on peer abuse policy (see appendix 6)** to address this both in terms of prevention and action should it occur.

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

This might include where the alleged behaviour:

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

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but **do not investigate it.**
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police **if the allegation involves a potential criminal offence.**
- The DSL will put a **risk assessment and support plan** into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL will contact children and adolescent mental health services (CAMHS), if appropriate.

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils know they can talk to staff confidentially by informing students through tutorials, assemblies and the school TV system.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Section 7.9: Sharing of Nudes or Semi-Nudes

This is an approach based on guidance from the UK Council for Child Internet Safety for [all staff](#) and for [DSLs and senior leaders](#).

<https://www.gov.uk/government/publications/sexting-in-schools-and-colleges>

Your responsibilities when responding to an incident:

If you are made aware of an incident involving the sharing of 'youth produced sexual imagery', you must report it to the DSL immediately.

You must **not**:

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

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

The Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s).
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the imagery to safeguard the young person (in most cases, imagery should not be viewed).
- What further information is required to decide on the best response.

- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved).

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

- The incident **involves an adult**.
- There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- **The imagery involves sexual acts and any pupil in the imagery is under 13.**
- The DSL has reason to believe a pupil is **at immediate risk of harm** owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

Informing Parents

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the Police

If it is necessary to refer an incident to the police, this will be done through:

- Contacting PCSO Craig Dixon
- Contacting Safer Schools Officer
- Dialling 101

Recording Incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum Coverage

Students are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sharing nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Section 8: Notifying Parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

Section 9: Reporting Systems for our Children

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse.

- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

At The Halifax Academy we will use the following reporting systems:

- A poster in each classroom highlights DSLs and other members of staff who children can go to with any concerns. Alongside this, children are reminded through assemblies, character curriculum lessons and safeguarding sessions that they can speak to any safe adult in school with any concerns or worries.
- NSPCC posters are displayed around school with contact numbers for reporting anonymously - older children are signposted to this through Teams and social media.

Section 10: Online Safety and the use of Mobile Technology

At The Halifax Academy we have an online safety policy which can be found on the school website.

<https://thehalifaxacademy.org/wp-content/uploads/2020/07/E-safety-Policy-1218.pdf>

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

To address this, our school aims to:

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

The Four Key Categories of Risk:

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

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

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

Educate pupils about online safety as part of our curriculum. For example; the safe use of social media, the internet and technology, keeping personal information private, how to recognise unacceptable behaviour online, how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year which will include guidance on using their personal devices in school.

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.

Make all pupils, parents/carers, staff, volunteers, and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#).

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. (In addition, please refer to the Trust's Staff Policy Handbook).

As part of our academy activities, we may take photographs and record images of individuals within our academy. We will obtain written consent from parents/carers, or pupils aged 18 and over, for photographs and videos to be taken of their child for communication, marketing, and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil. Uses may include:

- Within school on notice boards and in academy magazines, brochures, newsletters, etc.
- Outside of school by external agencies such as the school photographer, newspapers, campaigns
- Online on our school website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

Section 11: Pupils with SEND and Medical Needs

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Pupils being more prone to peer group isolation than other pupils.
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

- Personalised curricula e.g., Accelerator and Impact Programme in KS3 and 4
- In class support (support assistants)
- Resources for support e.g., Reader pens
- Support from teachers of SEN (in class, in small groups or on an individual basis)
- Targeted intervention and nurture sessions
- Support from external agencies (e.g. Calderdale Visually Impaired Team).
- Resourced provision-based time for hearing impaired students
- Access to key members of staff and a SEND base

External partnerships are in place with the following:

- Educational Psychology
- Calderdale Specialist Provisions
- School Health
- CAMHS
- Physiotherapists
- Occupational therapists
- Early Help
- THISS
- In-school counselling

*This list is not exhaustive

Section 12: Children Looked After and Previously Looked After Children

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

In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

- The DSL has details of children’s social workers and relevant virtual school heads.
- We have appointed a designated teacher, Jo George AAHT and DSL who is responsible for promoting the educational achievement of children looked after and previously looked after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

Section 13: Complaints and Concerns about School Safeguarding Policies

Section 13.1: Complaints Against Staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3 and THA policy for Managing Allegations).

Section 13.2: Other Complaints

General Principles:

The Halifax Academy is clear about the difference between a concern and a complaint. By taking informal concerns seriously at the earliest stage, the numbers that develop into formal complaints are kept to a minimum.

The underlying principle in our school is that concerns are handled without the need for formal procedures. For example, if necessary, staff receiving the first approach try to resolve issues on the spot by discussing and apologising, if necessary.

Formal procedures are only started after initial attempts to resolve the issue are unsuccessful and the person raising the concern remains dissatisfied and wishes to take the matter further.

The Halifax Academy:

- Welcomes complaints as a positive means of promoting pupil/parent satisfaction.
- Uses complaints as a way of identifying opportunities to do things better.
- Listens to pupils and parents.
- Seeks to resolve complaints swiftly.
- Replies with an acknowledgement letter or telephone call, in the first instance if a complaint is sent in by letter to let the complainant know that we are looking into the matter.
- Has clear, simple to understand and use, published procedures for making complaints.
- Keeps complainants informed about progress.

- Provides redress where a complaint is found to have substance.
- Regularly reviews how effective the complaints procedure is.

Investigating Complaints:

The person who takes forward the first formal procedure makes sure s/he:

1. Establishes what has happened so far and who has been involved
2. Clarifies the nature of the complaint and what remains unresolved
3. Meets the complainant or contacts them if further information is required
4. Clarifies what the complainant feels would put things right
5. Interviews those involved, with an open mind
6. Keeps notes of any interviews
7. Keeps the Chair of Governors informed, without giving any details at this stage

Resolving Complaints:

At each stage, the school keeps in mind ways the complaint can be resolved. It might be sufficient to acknowledge that the complaint is valid in whole or in part. It might also be appropriate to offer:

- an apology
- an explanation
- an admission that the situation could have been handled differently or better
- an assurance that the event complained of will not recur
- an explanation of the steps taken to make sure it will not happen again
- an undertaking to review school policies in light of the complaint

The school encourages complainants to state what actions they feel might resolve the problem at any stage.

For further information, including how we investigate a complaint please refer to our Complaints Procedure on the school website.

https://thehalifaxacademy.org/wp-content/uploads/2021/04/complaints_policy-March-2021-v2.pdf

Section 13.3: Whistleblowing

Please refer to the Trust's Staff Policy Handbook on Whistleblowing on Pages 87-92.

We will signpost parents and/or carers of children in EYFS to details about how to contact Ofsted as appropriate/when requested.

Section 14: Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child. Any non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

At The Halifax Academy:

Records are kept electronically using a secure, password protected CPOMS system.

Records are held within CPOMS, and documents are uploaded, and paper copies destroyed.

Records are kept secure through CPOMS 2 factor authentication system.

Electronic information on CPOMS is retained until a pupil leaves to attend another school. When this happens the new school can request records via the CPOM system. The lead DSL will authorise transfers for individual children via the CPOM secure system.

If it is appropriate to keep a safeguarding record confidential, then information will be saved on a secure, password protected folder on the school server. This can only be accessed by the lead DSL and DDSL's when and if appropriate.

At The Halifax Academy records include:

- Any child protection information received from the child's previous educational establishment
- Records of discussions, telephone calls and meetings with colleagues and other agencies or services
- Professional consultations
- Letters and emails sent and received relating to child protection matters
- Referral forms sent to Duty and Advice, other external agencies or education- based services
- Minutes or notes of meetings, e.g. child protection conferences, core group meetings, etc., copied to the file of each child in the family, as appropriate
- Formal plans for, or linked to, the child e.g. Child Protection Plans, Early Support risk assessments etc
- A copy of any support plan for the pupil concerned will be uploaded and recorded on CPOMS

When a pupil leaves this academy, we will ensure that the child protection file is transferred securely and separately from the main pupil file to the receiving school/educational establishment (where this is known) as soon as possible and within 15 school days. **This is a legal requirement set out under regulation 9 (3) of 'The Education (Pupil Information – England) Regulations 2005. A copy of the chronology will be retained for audit purposes.**

When there is an existing risk management plan/assessment in place for behaviours that are deemed potentially harmful to the pupil or others (i.e., self-harming or harmful sexualised behaviour), this information will be shared with the destination provision prior to the pupil starting so that appropriate care and control measures can be put in place to mitigate the potential of any risk of further harm occurring.

The designated safeguarding lead will consider if it would be appropriate to share any information with the new school or college in advance of a child leaving, for example prior to a transfer programme. When a child leaves school before statutory school leaving age, the child protection file will be transferred to the new school or college. There is no need for this school to keep written or electronic copies of the child protection records, therefore these will be deleted from electronic systems once the successful transfer has been confirmed. The exception to this rule will be in any of the following instances:

- When a vulnerable young person is moving to a further education establishment, consideration will be given to the pupil's wishes and feelings about their child protection information being passed on, in order that the FE establishment can provide appropriate support. In cases when it is deemed appropriate, relevant child protection information will be shared via the FE Safeguarding Information Sharing Form (Appendix 9). The original records will be retained and archived by this school/college. Due consideration will be given to the sharing of any additional information requested by the receiving establishment
- When the destination school is not known (the original records should be retained by the academy)
- When the child has not attended the nominated school (the original records should be retained by the academy)
- There is any on-going legal action (the original file should be retained by the academy and a copy sent)

Pupil records will be transferred in a secure manner, for example, through secure electronic file transfer or by hand. When hand-delivering pupil records, a list of the names of those pupils whose records are being transferred and the name of the school/college they are being transferred to will be made and a signature obtained from the receiving school/college as proof of receipt. When sending records through secure electronic file transfer, a delivery and read receipt of the transfer will be retained for audit purposes.

If a pupil moves from our school, child protection records will be forwarded onto the named designated safeguarding lead at the new school, with due regard to their confidential nature. Good practice suggests that this should always be done with a face-to-face handover between designated staff, or a verbal conversation is had over the telephone if a face-to-face handover is not possible. A signed receipt of file transfer or an electronic delivery and read receipt must be obtained for audit purposes by the delivering school.

When sending by post, pupil's records will be sent "Special Delivery". A note of the special delivery number should also be made to enable the records to be tracked and traced via Royal Mail.

For audit purposes a note of all pupil records transferred or received will be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent, and the date sent and/or received. A copy of the child protection chronology will also be retained for audit purposes and kept securely.

If a pupil is permanently excluded and moves to an alternative or specialist provision, child protection records will be forwarded onto the relevant organisation in accordance with the 'The Education (Pupil Information – England) Regulations 2005, following the above procedure for delivery of the records.

When a designated safeguarding lead member of staff resigns their post or no longer has child protection responsibility, there will be a full face to face handover/exchange of information with the new post holder.

In exceptional circumstances when a face-to-face handover is unfeasible, it is the responsibility of the Headteacher to ensure that the new post holder is fully conversant with all procedures and case files. All designated safeguarding leads receiving current (live) files or closed files will keep all contents enclosed and not remove any material.

All receipts confirming file transfer will be kept in accordance with the recommended school retention periods. For further information refer to the archiving section.

Archiving

The school that the pupil attended until statutory school leaving age (or the school where the pupil completed sixth form studies) is responsible for retaining any child protection records they may hold. The recommended retention periods is **35 years from closure** when there has been a referral to Duty and Advice.

If no referral has been made to Duty and Advice the child protection record should be retained until the **child's 25th birthday**, after which point the file will be destroyed confidentially/deleted from our school electronic system. The decision of how and where to store child protection files must be made by our school via our governing body.

Due to sensitivity of the information, the records should continue to be held in a secure area with limited access e.g. designated officer or head teacher. **The DSL is responsible for ensuring that all child protection files are archived in accordance with the timescales referenced above. The designated safeguarding lead is responsible for ensuring that the appropriate timeframes for archiving and destroying child protection records referenced above are set on electronic systems accordingly for each pupil.**

Child and Parent Access to Child Protection Files

Under Data Protection legislation (General Data Protection Regulation & Data Protection Act 2018) a pupil or their nominated representative have several legal rights in respect of information relating to them. These rights include the right to access and the right to rectification of inaccurate data. Therefore, it is important to remember that all information should be accurately recorded, objective in nature and expressed in a professional manner.

Any pupil who has a child protection file has a right to request access to it. However, neither the pupil nor the parent has an automatic right to see all the information held in child protection records.

Information can be withheld if disclosure:

- Could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person.
- Could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child.
- Is likely to prejudice an on-going criminal investigation.
- Information about the child also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

It is best practice to make reports available to the child or their parents unless the exceptions described above apply. If an application is made to see the whole record, advice can be sought from the Local Authority.

The establishment's report to the child protection conference should be shared with the child, if old enough, and parent at least two days before the conference.

Safe destruction of the pupil record

Where records have been identified for destruction, they will be disposed of securely at the end of the academic year (or as soon as practical before that time). Records which have been identified for destruction should be confidentially destroyed. This is because they will either contain personal or sensitive information, which is subject to the requirements of Data Protection legislation, or they will contain information which is confidential to our school or the Local Authority. Information should be shredded (or deleted as appropriate) prior to disposal or confidential disposal can be arranged through private contractors. For audit purposes the academy will maintain a list of records which have been destroyed and who authorised their destruction. This can be kept securely in either paper or an electronic format.

In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Section 15: Training

Section 15.1: All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistleblowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

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

Volunteers will receive appropriate training, if applicable.

Section 15.2: The DSL and Deputy DSLs

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

Section 15.3: Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the Chair of Governors may be required to act as the 'case manager' if an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

Section 15.4: Recruitment – Interview Panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, the current Keeping Children Safe in Education guidance, and will be in line with local safeguarding procedures.

Section 15.5: Staff who have Contact with Pupils and Families

All staff who have contact with children and families will have supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

Section 16: Monitoring Arrangements

This policy will be reviewed **annually** by Jo George/Designated Safeguarding Lead. At every review, it will be approved by the full governing board.

Section 17: Links with Other Policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct.
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Sex and relationship education
- First aid
- Curriculum
- Privacy notices
- SEND
- Mobile Phone
- Data Protection
- Anti-Bullying

Appendices

Appendix 1: Types of Abuse

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

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

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

Emotional Abuse may involve conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person, not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate, age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction, seeing or hearing the ill-treatment of another, serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

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

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

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

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

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

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

Appendix 2: Safer Recruitment and DBS checks – Policy and Procedures

See IMPACT Staff Policy Handbook. Part 1. Section 1.2 Page 6.

Where an allegation is made against a supply teacher, the Headteacher will immediately contact both the agency concerned and the LADO. The school will continue to support any investigation that is required or take the lead with the agreement of the relevant agency.

Pupils Staying with Host Families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix 3: Allegations of Abuse Made Against Staff

We follow the Disciplinary Procedure on Pages 42-51 of the Trust's Staff Policy Handbook.

Section 1: Allegations That May Meet the Harms Threshold

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

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

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

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

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

Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the academy trust

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

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

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

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

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Additional considerations for supply teachers and all contracted staff

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

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.

The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

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

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

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

Specific Actions:

1. Action following a criminal investigation or prosecution:

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

2. Conclusion of a case where the allegation is substantiated:

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

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

3. Individuals returning to work after suspension:

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

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

4. Unsubstantiated, unfounded, false or malicious reports:

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

Confidentiality and Information Sharing

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

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

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

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

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

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

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

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual
- For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-Recent Allegations

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

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

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

Calderdale LADO Referral Form

ALLEGATIONS AGAINST PEOPLE WHO WORK WITH CHILDREN

Please return to: LADOadmin@calderdale.gov.uk

Calderdale Council is registered with the Information Commissioners Office (ICO) under the provisions of the Data Protection Act 2018. The Council takes its responsibilities under the Act very seriously.

The information provided by you is collected in order to investigate a LADO referral. We need to collect this information in order to maintain accurate records of the referral and any subsequent investigation process. Completion of this form/sharing your information with us constitutes explicit consent from you for us to process your data for this purpose. Processing is necessary to protect the vital interests of a data subject or another person. Your information may be shared with other professionals and agencies in accordance with the allegation management process

Unless the information is required by law, you may withdraw this consent at any time by writing to me at the email address above. In addition you have the right to see what information is held about you, to have inaccurate information corrected, to have information removed from our system unless we are required by law or a statutory purpose to keep it and the right to complain to the Data Protection Officer if you feel that your data has not been handled in accordance with the law.

Your information will be recorded on our system to maintain up to date records. This information will be kept for a maximum of 25 years from the date of closure of the referral or until such time as the data is reviewed by us or removed at your request.

The Data Protection Officer, Tracie Robinson, can be contacted at information_management@calderdale.gov.uk

Date of Referral:

Name of Referrer:

Agency of Referrer:

Contact details of Referrer:

Alleged Perpetrator

Name of Alleged Perpetrator:

Home Address:

Date of Birth:

Employer Name and Contact Details:

Position within the Organisation:

Alleged Victim

Name of Child(ren):

Date of Birth:

Person with PR:

Address:

Reason for Referral:

Action Taken by Referrer

Outcome by the LADO

(this section to be completed by the LADO and returned to you, for your record).

Section 2: Concerns that do not meet the harm threshold

* [See managing concerns policy for more detail.](#)

Statement of intent

Impact Education Trust ("the Trust") understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. While a concern may be low-level, that concern can escalate over time to become much more serious.

The aim of this policy is to contribute to embedding a safeguarding culture in which the clear values and expected behaviours (which are set out in our Code of Conduct) are lived, perceived, and constantly monitored by all staff.

Specifically, this means to:

- Create a safe environment for pupils;
- Maintain a culture of openness, trust and transparency
- Ensure that staff are confident and clear about expected behaviours of themselves and their colleagues, and reporting lines
- Ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be understood as falling short of the standards set out in our Code of Conduct
- Enable responsive, sensitive and proportionate handling of such concerns when they are raised
- Maintain on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

What is a low-level concern, including those that are self-reports?

For the purposes of this policy, a "low-level concern" is defined as any concern had about an individual's behaviour towards a child that does not meet the threshold for being considered an allegation (see below) or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns often refer to behaviour on the part of an individual that is considered inappropriate in line with statutory safeguarding advice and the Trust's Code of Conduct. A low-level concern could be a concern, no matter how small and even if no more than a 'nagging doubt' including a sense of unease as to the individual's behaviour particularly towards or around children.

Low-level concerns are differentiated from allegations.

"Allegations" are defined in this policy as accusations that an adult has: behaved in a way that has harmed a child or may have harmed a child; and/or possibly committed a criminal offence against, or related to, a child; and/or behaved towards a child in a way that indicates they may pose a potential risk of harm to children; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children (Keeping Children Safe in Education 2021, page 81 paragraph 338); and/or there is a pattern of low-level concerns which collectively amount to an allegation; and/or there is other information which, when considered, leads to an allegation.

While low-level concerns are, by their nature, less serious than allegations, the Trust understands that many serious safeguarding concerns (for example child sexual abuse), often begin with low-level concerns, such as subtle grooming by the offender. The Trust will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

Self-reporting Low level concerns about an adult

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Where a staff member wishes to work outside of their contract with the school, they should first seek agreement with their Headteacher, and a written confirmation placed in their employee file.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.

As such, the school sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Low-level concerns about others

The Trust understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors.

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

The Trust will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school / academy community, e.g., pupils are not treated as friends and an appropriate professional distance and approach is maintained by staff.

The Trust will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted, as necessary. The Trust will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

What should I do if I have one?

The Trust will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns to the Headteacher regardless of whether they relate to a fellow member of staff.

Where a low-level concern (including self-reports) exists:-

- It should be reported to the Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).
- If there are concerns about the Headteacher then these should be reported to the CEO.
- Staff members should report their concerns by submitting a Low-level Concern Reporting Form.
- Staff members may request anonymity when reporting a concern, and the Trust will endeavour to respect this as far as possible. However, the Trust would encourage staff to feel comfortable about voicing any concerns openly. Completely anonymous disclosures are difficult to investigate. If a staff member wants to raise their concern confidentially, then the Trust will make every effort to keep their identity secret and only reveal it where necessary to those involved in investigating the concern. Staff will be protected from potential repercussions caused by reporting a genuine

concern. However, if we conclude that a false allegation has been maliciously made, then the individual concerned may be subject to disciplinary action.

How will a low-level concern be handled (including self-report)?

The Headteacher will, in the first instance, satisfy him/herself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure.

Where the Headteacher is in any doubt whatsoever, advice will be sought from the DSL. If necessary this may be on a no-names basis.

Acting on concerns

Where it is determined that a concern is low-level, the Trust will respond in a sensitive and proportionate manner. The following procedure will be followed:

The DSL and or Headteacher will hold a meeting with the individual about whom the concern was reported, during which they will:

- Talk to the individual in a non-accusatory and sympathetic manner.
- Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
- Clearly state what about their behaviour was inappropriate and problematic.
- Discuss the reasons for the behaviour with the individual.
- Inform the individual clearly what about their behaviour needs to change.
- Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
- Allow the individual the opportunity to respond to the concern in their own words.

The Headteacher will consider whether the individual should receive guidance, supervision or any further training.

Where considered appropriate in the circumstances, the Headteacher may ask the DSL to develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.

Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly and information will only be disclosed to individuals on a need-to-know basis.

Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated.

Where the Headteacher decides upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about

the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation.

What records will be kept?

Where a low-level concern has been communicated, or a self-report raised by an individual about themselves, a confidential record will be kept in a central file which logs all low-level concerns and will be retained until the staff member reaches normal pension age or 10 years after if longer. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- the concern (or group of concerns) has been reclassified as an allegation as above; or
- the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

Monitoring and review

This policy will be reviewed annually by the Trust, and in response to any new safeguarding guidance or legislation.

Appendix 4: Specific safeguarding issues

*This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular Annex B. Annex B also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime.

This academy follows the Calderdale Safeguarding Children Partnership online multi-agency procedures and will, where necessary, have due regard to the government guidance for children in specific circumstances as outlined in Part 1 and Annex B of Keeping Children Safe in Education (KCSiE 2021). <https://safeguarding.calderdale.gov.uk/the-organisations/safeguarding-children-partnership>

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

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

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

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

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

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange

for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

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

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

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

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

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

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of

domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#).

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

Homelessness

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

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

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

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

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

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

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

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

Forced marriage

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

Threats can be physical or emotional and psychological.

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmfu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our Prevent risk assessment and assembly plan which maps out workshops linked to the Prevent strategy.

Peer-on-peer abuse

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

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

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

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

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

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

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
- Risk factors which increase the likelihood of involvement in serious violence include:
 - Being male
 - Having been frequently absent or permanently excluded from school
 - Having experienced child maltreatment
 - Having been involved in offending, such as theft or robbery

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors use the electronic sign in system and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and will be asked to show their DBS certificate, which will be checked alongside their photo ID; or the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be always accompanied by a member of staff. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Supervise the child in school until contact can be made and the child is collected
- Phone and text the parent
- Phone and text all three contacts on file
- Contact any other agencies involved with the family
- A member of staff will visit the home to establish contact
- Contact Duty and Advice
- Contact the police
- The incident will be recorded on CPOMS

Missing pupils

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

- Search the building and surrounding area
- Contact parents
- Report to 101
- Liaise with all agencies
- Record the incident on CPOMS

KCSIE 2021:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSI_2021_September_guidance.pdf

Annex A: Safeguarding information for school and college staff p118

Annex B: Further information p123

Annex C: Role of the designated safeguarding lead p143

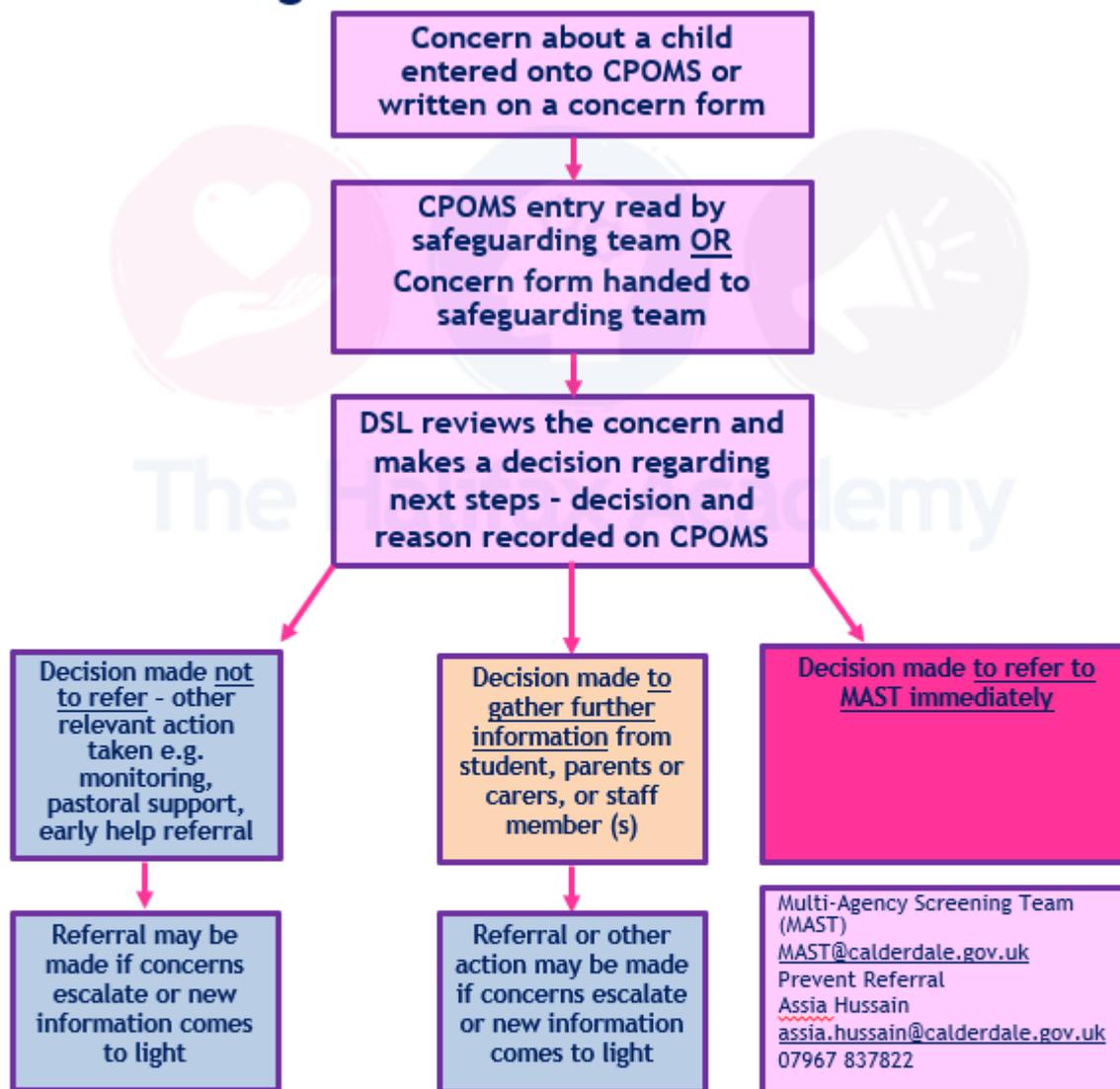
Annex E: Host families-homestay during exchange visits p153

Annex F: Statutory guidance - Regulated activity (children) - Supervision of activity with children which is regulated activity when unsupervised p156

Annex G: Table of substantive changes from September 2021 p159

Appendix 5: THA Reporting Flow Chart

Raising Concerns About a Child at THA



- ✓ Students are monitored at all stages
- ✓ All decisions and notes are recorded on CPOMS throughout

Safeguarding Team:
 Jo George (DSL)
 Sue Keasey (Deputy DSL phase 1-3)
 Tracey King (Deputy DSL phase 3-5)
 Diane Cothey (Link Governor)

Local Authority Designated Officer (LADO):
 Natalie Alleyne
LADOadmin@calderdale.gov.uk
 01422 394055

Appendix 5: Cause for Concern Form



The Halifax Academy

Child Protection Cause for Concern Form

Date:		Time:	
Name of Child:			
Other children involved:			
Reporting Adult:		Role:	
Reporting Adult Signature:		DSL Signature:	

What are you worried about?

What is working well/positive about the situation?

What needs to happen next?

DSL/DDSL Follow up:

***Please ensure this form is handed to one of the safeguarding team:**

Jo George - Designated Safeguarding Lead
jgeorge@thehalifaxacademy.org 07719 527 852

Tracey King - Deputy Designated Safeguarding Lead
(Secondary) tking@thehalifaxacademy.org 07809 207 245

Sue Keasey - Deputy Designated Safeguarding Lead (Primary)
skeasey@thehalifaxacademy.org 07783 631

Appendix 6: Peer on Peer Abuse Policy



The Halifax Academy

Peer on Peer Abuse Policy

2021-2022

Date of Issue: 1st September 2021	
Status: Statutory	
Approved by LGB: October 2021	Date: October 2021
Last review: N/A	
Next Review: September 2022	

These procedures are in line with 'Keeping Children Safe in Education' (2021) and should be read alongside the school's Safeguarding Policy and Child Protection Procedures.

These procedures relate to members of staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place.

Contents

1. Introduction
2. Purpose and Aim
3. What is Peer on Peer Abuse?
4. Children with SEND
5. Language
6. Types of Abuse
7. Hackett's Continuum of Behaviour
8. Expected Action from all Staff

Appendices:

1. Peer on Peer Abuse Response Flow chart
2. Risk Assessment Form following Peer on Peer Abuse Incident

Introduction

Keeping Children Safe in Education 2021 states that 'Governing bodies and proprietors should ensure there are appropriate policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare. These should include individual schools and colleges having: an effective child protection policy which:

- should describe procedures which are in accordance with government guidance;
- refer to locally agreed multi-agency safeguarding arrangements put in place by the three safeguarding partners;
- include policies as reflected elsewhere in Part two of this guidance, such as online safety, **peer on peer abuse** and SEND

Our staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Our staff are aware that safeguarding issues can manifest themselves via peer-on-peer abuse. All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element, which facilitates, threatens and/or encourages physical abuse)
- Abuse in intimate relationships between peers
- Sexual violence and sexual harassment
- Causing someone to engage in sexual activity without consent
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, to obtain sexual gratification or cause the victim humiliation, distress or alarm
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- Initiation/hazing type violence and rituals, which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element (KCSIE 2021).

At The Halifax Academy we are committed to the prevention, early identification and appropriate management of peer on peer abuse. We continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and wellbeing.

Our policy includes a clear and comprehensive strategy taking a contextual whole-school approach to preventing and responding to peer on peer abuse, which includes a clear understanding to staff, children and young people and their parents about everyone's responsibility in managing any peer on peer abuse incidents.

This will include both our prevention measures as well as our response to any incidents of harm.

Purpose and Aim

Children and young people may be harmful to one another in a number of ways which would be classified as peer-on-peer abuse. The purpose of this policy is to explore the many forms of peer-on-peer abuse and include a **planned and supportive response** to the issues.

At The Halifax Academy we have the following policies in place that should be read in conjunction with this policy:

1. Safeguarding and Child Protection Procedures Policy
2. Anti-Bullying Policy
3. Online Safety Policy
4. Children Missing from Education Policy
5. Behaviour Policy

This policy is supported by the key principles of the Children's Act 1989 that the child's welfare is paramount. Another key document that focuses adult thinking towards the views of the child is Working Together 2018, highlighting that every assessment of a child, should '**reflect the unique characteristics of the child within their family and community context**' (Working Together, 2018:28).

This is clearly echoed by Keeping Children Safe in Education 2021 through ensuring procedures are in place in schools and settings to hear the voice of the child and to be mindful of the contexts children live in.

What is Peer on Peer Abuse?

Peer on peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).

Peer on peer abuse can take various forms, including: serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to peer-on-peer abuse therefore needs to consider the range of possible types of peer on peer abuse set out above and capture the full context of children's experiences.

This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of peer-on peer abuse considers any potential complexity. Abusive behaviour can happen to pupils in schools and settings, and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence (KCSIE 2020).

Research suggests that peer on peer abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up.

Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of peer-on-peer abuse within their settings and recognise that these will play out differently in single sex, mixed or gender imbalanced environments (Farrer and Co. 2017). It is important to consider the forms abuse may take and the subsequent actions required.

Children with Special Educational Needs

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, we will consider extra pastoral support for children with SEND and disabilities particularly when investigating any form of peer on peer abuse. (KCSIE, 2021)

Language

For the purposes of this policy the language used will refer to alleged victims and alleged perpetrators as research has shown that many children who present with harmful behaviour towards others, in the context of peer-on-peer abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers. (Farrer and Co. 2017). The language used to children and parents in the reporting of any incidents that may have occurred could impact on any future rehabilitation of children and young people following any investigations that may occur.

Types of Abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken.

i. Physical Abuse

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

ii. Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another, sexual assault, rape or abuse.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual Harassment: means 'unwanted conduct of a sexual nature' that can occur online and offline. In referencing sexual harassment, it is in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment (KCSIE 2021).

iii. Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or

gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks and understand the measures in place to manage these.

iv. Bullying (inclusive of all types)

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences. Bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online. Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour.

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone for the same reasons as stated above. It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour. If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the school will have no choice but to involve the police to investigate these situations.

v. Sexting (Youth Produced Imagery)

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can occur in any relationship, to anyone, whatever their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

vi. Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have

something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

vii. Up Skirting

The Voyeurism (Offences) Act 2019 criminalises the act of 'up skirting'. The Criminal Prosecution Service (CPS) defines 'up skirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. This which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; sexting (also known as youth produced sexual imagery).

viii. Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

viii. Teenage Relationship Abuse

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

Hackett's Continuum of Behaviour

Measuring the behaviour

Simon Hackett's continuum of behaviour (taken from Farrer and Co. 2017) can be a useful guide to measure the behaviour that has occurred and consider the circumstances around the incident(s).

The continuum looks at whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
- involves a misuse of power

Hackett's Continuum of Sexual Behaviour in children

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure victim compliance • Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is physiologically and/or sexually arousing to the perpetrator • Sadism

Source: Harmful Sexual Behaviour Framework (NSPCC, 2019)

Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies.

Expected action taken from all staff

All staff should be alert to the wellbeing of children and young people and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ (Farrer and Co. 2017).

Although the type of abuse may have a varying effect on the alleged victim and alleged perpetrator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get a true, accurate account of the facts around what has happened, so that nothing is forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved.

For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled. In all cases of peer on peer abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

Staff should also be mindful of contextual safeguarding and that wider safeguarding concerns may influence the child's account of the event(s). Alongside this peer pressure and the impact of sharing information about the incident(s) may also influence a child's account.

1. Gather the Facts

In cases specifically relating to sexual violence and sexual harassment, part 5 of Keeping Children Safe in Education, 2021 states that two members of staff (one being the Designated Safeguarding Lead) should be present to manage the report, where possible. In all circumstances, staff need to speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?).

2. Reporting

A full and clear record of exactly what the young person has said in their own language should be made and stored on CPOMS using the peer-on-peer categories of concern.

3. Consider the intent (begin to Risk Assess)

Has this been a deliberate or contrived situation for a young person to be able to harm another?

4. Decide on a course of action

If we believe any young person to be at risk of significant harm we will make a MAST referral to social care immediately (where a crime has been committed the police will be involved also). This action would, in most circumstances be undertaken by the Designated Safeguarding Lead but in the event of their absence the referral can be made by another member of staff. If this is the case, once social care has been contacted and made a decision on what will happen next then we will be informed of our next steps.

If social care and the police intend to pursue this further they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take. It may also be that social care feel that it does not meet their criteria in which case we may challenge that decision, with that individual or their line manager.

If on discussion however, we agree with the decision, we may then be left to inform parents.

5. Informing Parents

If, once appropriate advice has been sought from police/social care and we have agreement to inform parents or have been allocated that role from the other services involved then we need to inform the parents as soon as possible. If services are not going to be involved then equally, this information may need to be shared with parents. **Parents would not be informed if by doing so the child was put at further risk of significant harm.** The best way to inform parents is face to face and we will strive to do this whenever possible.

Points we will consider include:

- What is the age of the children involved? How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, in particular 1–4 year-olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however, should not be overlooked if other issues arise (see following))
- Where did the incident or incidents take place? Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?
- What was the explanation by all children involved of what occurred? Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved?
- Is the incident seen to be bullying for example, in which case regular and repetitive?
- Is the version of one young person different from another and why?
- What is each of the children's own understanding of what occurred?
- Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch?
- Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour?
- Is the behaviour deliberate and contrived?
- Does the young person understand the impact of their behaviour on the other person?
- Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

6. Outcomes

The outcome of the investigation will follow our local threshold guidance. Therefore, either a referral will have been made to either the police/MAST for a full investigation (Tier 4).

It may have resulted in Children's Services undertaking a further assessment (Tier 3) or as a school/setting we may have identified additional services/intervention that are non-statutory and in which case completed an early help assessment (Tier 2).

It may be that on investigation, a decision has been made to handle the incident(s) internally and which case we may implement a risk assessment plan (see appendix) (Tier 1).

In any of the above outcomes we have a duty of care to manage the education needs of both children/young people in which case a risk assessment plan may be needed irrespective of the outcome.

7. Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the young person who has been harmed (alleged victim):

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people or some restorative justice work with all those involved may be required. Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PHSE and SMSC that certain issues can be discussed and debated more frequently. If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the young person who has displayed harmful behaviour (alleged perpetrator):

In this circumstance it is important to find out **why** the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Support from identified services may be necessary through an early help referral and the young person may require additional support from family members. Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will be provided with appropriate support and education whilst off site. Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multiagency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

We may also choose a sanction as a consequence such as exclusion or internal exclusion for a period of time to allow the young person to reflect on their behaviour.

8. Aftercare

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret

or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

9. Disciplinary Action

Our school will need to consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour; (b) to demonstrate to the child/children and others that peer on peer abuse can never be tolerated; and (c) to ensure the safety and wellbeing of other children. However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action our School will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the peer on peer abuse and the causes of it. Our school will, where appropriate, consider the potential benefit, as well as challenge, of using exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the school.

10. Review of Circumstances

Following any incident of harm, it is necessary for our school to consider if anything could have been done differently. This demonstrates how proactive we are in continually reviewing our policies and systems in effectively keeping children safe.

11. Preventative Strategies (See also our Sexual Violence and Harassment Strategy)

It is important to develop appropriate strategies in order to prevent the issue of peer on peer abuse rather than manage the issues in a reactive way. Firstly, and most importantly is recognition that peer on peer abuse can and will occur on any site even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff. This can be supported by ensuring that each we have an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This can be strengthened through a strong and positive PSHE curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

At THA, our PSHE and wider curriculum incorporates:

- Healthy and respectful relationships
- What respectful behaviour looks like
- Consent
- Gender roles, stereotyping and equality
- Body confidence and self-esteem

- Prejudiced behaviour
- Sexual violence and sexual harassment

To enable such an open and honest environment we will ensure that the whole workforce and governing body feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another.

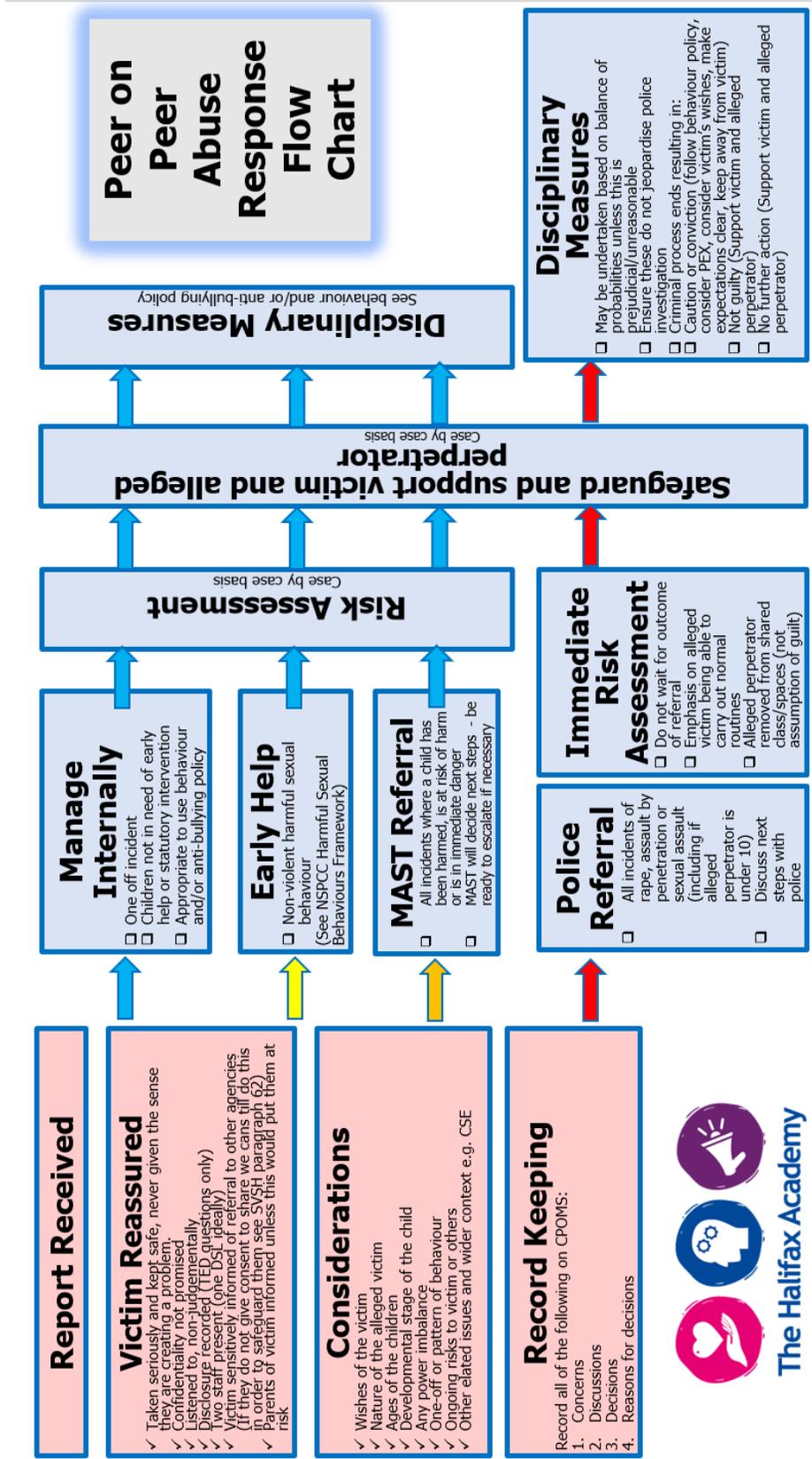
In order to create such an environment, it is necessary for us to implement whole staff training and CPDL around abusive behaviours and talking to young people in a way that continues to create an open and honest environment without prejudice.

It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action.

If staff minimise the concerns raised it may result in a young person seeking no further help or advice. Parents need to be informed and included in policy forming, lesson plans and through open and frank conversations, training/courses about what peer on peer abuse is and how the school and setting will be tackling it. This can help to alleviate any concerns and worries and create a joined-up approach.

It is important that signposting is available to young people in the event that they don't feel confident raising an issue to staff or a peer. We will do this through assemblies, our curriculum, physical noticeboards, conversations with the pastoral team and through the website and social media.

Appendix 1: Peer on Peer Abuse Response Flow Chart



Do they travel to and form school together or close to each other?				
Are they likely to encounter each other or anyone else involved outside of school?				
How can such contact be limited?				
Is there a risk of harm from social media and or gossip?				
Who will the risk assessment be communicated to?				
How will it be communicated?				
Proposed Review Date:				
Signed:				
Further action taken by THA:				

Police informed:	
MAST referral:	
Early Help referral:	
CAMHS referral:	
Other external service referral (specify):	
Other internal service referral (specify):	

Appendix 7: Managing Allegations and Low-Level Concerns Policy



The Halifax Academy

Managing Allegations and Low-Level Concerns Policy

2021-2022

Date of Issue: 1st September 2021
Status: Statutory
Approved by LGB: October 2021 Date: October 2021
Last review: N/A
Next Review: September 2022

These procedures are in line with 'Keeping Children Safe in Education' (2021) and should be read alongside the school's Safeguarding Policy and Child Protection Procedures.

These procedures relate to members of staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place.

Contents

1. Introduction
2. Summary
3. Keeping Children Safe in Education September 2021
4. Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct
5. Storing and use of Low-Level Concerns and follow-up information
6. Process to follow when an allegation is made
7. Process to follow when a Low-Level Concern is raised
8. Low Level Concern Form
9. Important contacts

Introduction

At The Halifax Academy we aim to create an open and transparent culture where all concerns about all adults involved with our school are dealt with promptly and appropriately.

We aim to identify any concerning, problematic or inappropriate behaviour **early; minimise the risk of abuse**; and ensure that adults working in or on behalf of our school are clear about **professional boundaries** and act within these boundaries, and in accordance with our school **ethos and values**.

This policy should be read alongside our Safeguarding and Child Protection and Staff Code of Conduct Policies.

Summary

It may be possible that a member of staff acts in a way that **does not cause risk to children**, but is however inappropriate. A member of staff who has a concern about another member of staff, volunteer, contractor or who, on reflection, recognises that their actions could have been viewed as a risk should inform the Headteacher about their concern using a Low-Level Record of Concern Form. **All lower-level concerns will be recorded in writing**. The record will include

- Details of the concern
- The context in which the concern arose
- The action taken
- The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible

***Should the concerns involve the Headteacher please inform the Chair of Governors.**

***If the Headteacher cannot be contacted regarding a low level concern about another member of staff, the Chair of Governors should be contacted instead.**

Keeping Children Safe in Education September 2021

The following is taken from Keeping Children Safe in Education September 2021 and identifies what may be considered behaviour relating to low level concern:

What is a low-level concern (LLC)?

409. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338 (and on page four of this policy in the red box).

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

- being over friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

411. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

412. It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Staff are encouraged to self-refer, where for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation:

Any adult linked to our school who has:

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

Low Level Concern:

Any adult linked to our school who has behaved in a way that:

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

Appropriate:

- Behaviour which is entirely consistent with our school's Code of Conduct, and the Law.

Storing and use of Low-Level Concerns and follow-up information

All low-level concerns must be shared with the Headteacher.

When responding to a low-level concern raised via a third party, the Headteacher (or DSL on instruction from the Headteacher) will collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously
- to the individual involved and any witnesses.

A decision will then be made about the next steps necessary to address the unprofessional behaviour and support the member of staff in how to correct it and avoid any repetition of the behaviour.

LLC forms and follow-up information will be stored securely within the school's safeguarding systems, with access only available to the Headteacher and DSL. The information collected will help to categorise

the type of behaviour and determine what further action may need to be taken. Information obtained will be recorded along with the rationale for decisions and action taken.

Where the Headteacher is in any doubt as to whether the concerns identified may meet the harm to a child threshold, they will seek the advice of the Calderdale LADO in the first instance.

This information will be stored in accordance with the school's GDPR and data protection policies (**Data Protection Act 2018 and the UK General Data Protection Regulation 2018**).

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher or those aware in the senior leadership team. Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Records will be reviewed so that **potential patterns** of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it should be referred to the LADO.

Whenever staff leave The Halifax Academy, any record of low-level concerns which are stored about them will be reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

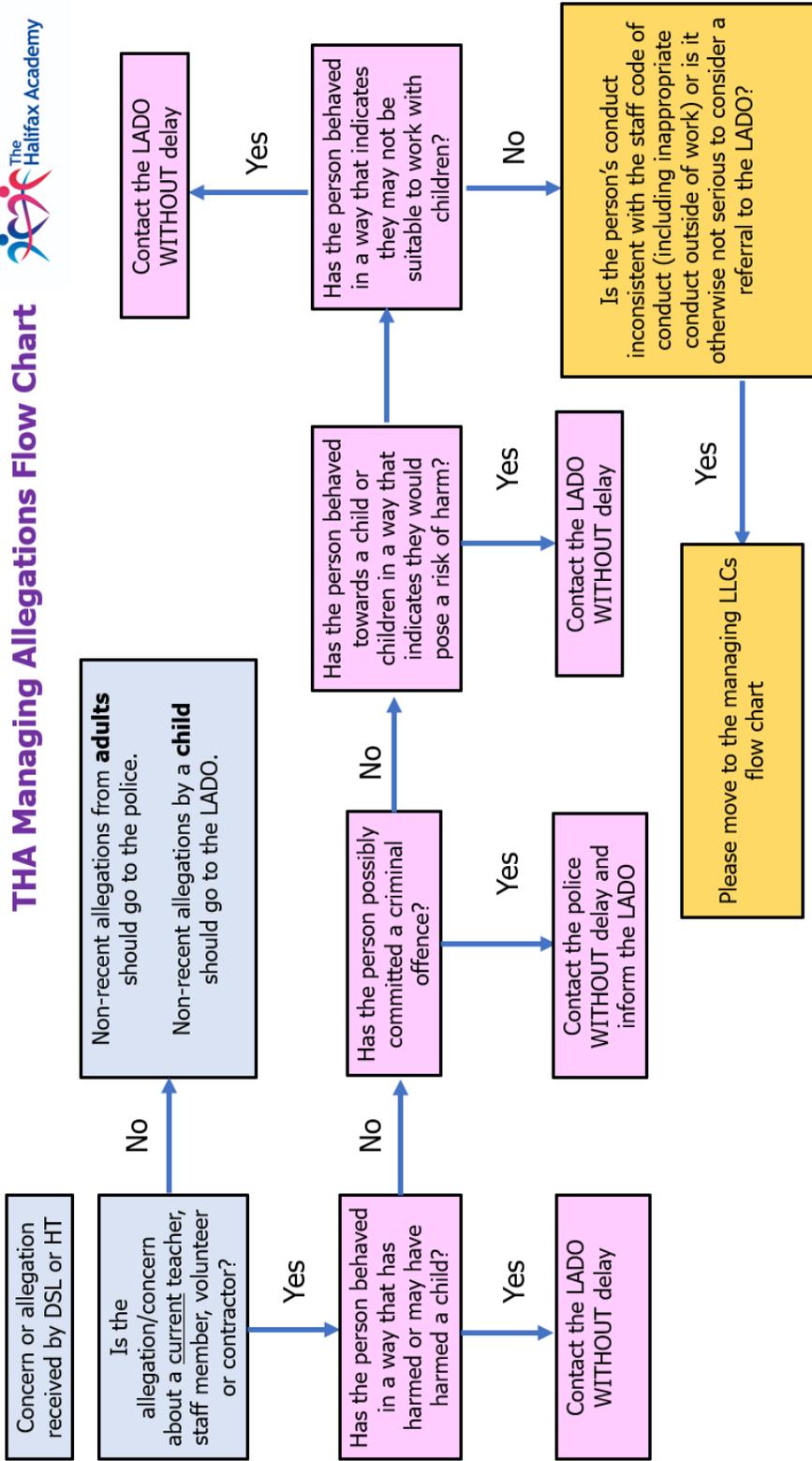
(a) whether some or all information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice; or

(b) if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly.

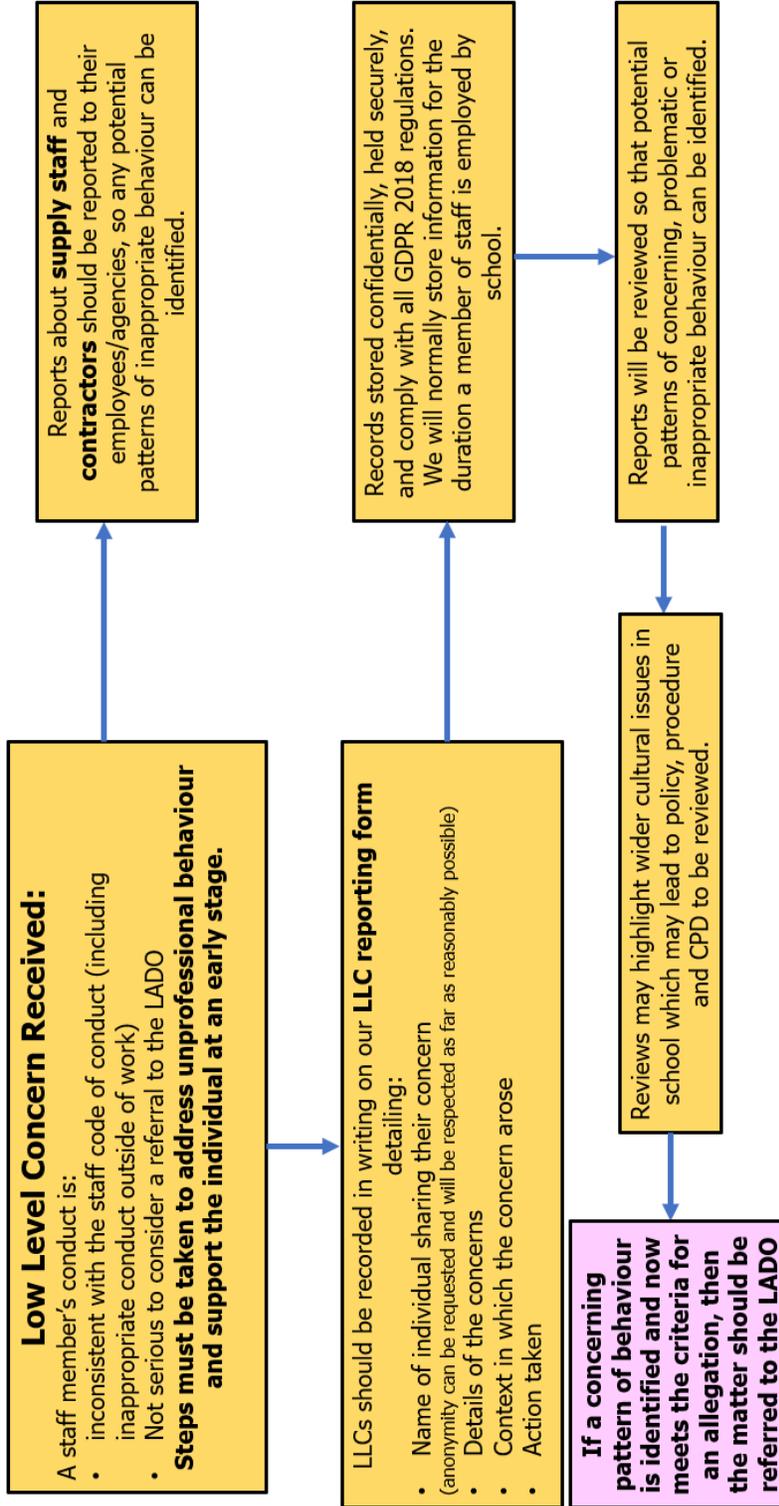
Managing Allegations Flow Chart



THA Managing Allegations Flow Chart



Managing Low Level Concerns Flow Chart



Low Level Concerns Reporting Form

Please complete and share with the Headteacher



Your Details		
Name (optional):		
Role:		
Date and time of completing this form:		
Details of the individual (including yourself for self-reporting) whom the concern is about		
Name:		
Role:		
Relationship to the you:		
Details of Concern		
<p>Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What happened exactly? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with staff code of conduct?</p>		
Details of any children/young people involved		
Name (s):		
Next Steps		
Are you willing to meet with the Headteacher and DSL to discuss your concern? Please circle as appropriate	Yes	No
Please state any other information you feel is relevant to the processing of this concern.		
Signature:		
For Use by HT/DSL upon receipt of the concern		
Date and time concern received:		
Signature:		
Role:		
Actions to be taken and follow up:		

Important Contacts:

1. Matt Perry, Headteacher mperry@thehalifaxacademy.org
2. Jo George, Designated Safeguarding Lead jgeorge@thehalifaxacademy.org
3. Phil Shepherd, Chair of Governors governor9@thehalifaxacademy.org
4. Natalie Alleyne, Calderdale LADO LADOadmin@calderdale.gov.uk 01422 394055

Keeping children safe in education 2021 Statutory guidance for schools and colleges September 2021

Annex A: Safeguarding information for school and college staff

Annex B: Further information

Annex C: Role of the designated safeguarding lead Annex E: Host families- homestay during exchange visits

Annex F: Statutory guidance - Regulated activity (children) - Supervision of activity with children which is regulated activity when unsupervised

Annex G: Table of substantive changes from September 2021

This information can be accessed here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf