



# Child Protection and Safeguarding Policy

**September 2021**

**Date: 3<sup>rd</sup> September 2021**

Ratified by the Board of Trustees

Signed by the Board of Trustees:

To be reviewed annually:

**Date: 29.09.2021**

**Date: September  
2022**

## Contents

1. Definitions .....	3
2. Introduction.....	3
3. Roles and Responsibilities .....	5
4. Types of abuse .....	10
5. Responding to signs of abuse .....	17
6. Record-keeping.....	25
7. Photography and Images .....	26
8. Early Help.....	26
9. Staff training .....	26
10. Safer Recruitment.....	27
11. Allegations of abuse against staff .....	28
14 Promoting safeguarding and welfare in the curriculum.....	31
15 Children Looked After .....	32
16 Children with Special Educational Needs and Disabilities or physical health needs .....	32
17 Use of reasonable force .....	33
18 Summary .....	34
19 Appendix A.....	34
20 Appendix B – Further Safeguarding Information .....	35
Appendix C .....	42
Appendix D.....	43
1. Changes.....	48

## 1. Definitions

1.1 'Safeguarding' is defined in **Keeping Children Safe in Education (2021)** as;

- protecting children from maltreatment;
- preventing the 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.

1.2 'Child Protection' is the intervention that occurs when children have been significantly harmed or are at risk of significant harm.

1.3 'Child' refers to everyone under the age of 18.

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

1.5 'Staff' or 'members of staff' refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of Kingsbury Academy

## 2. Introduction

2.1 We recognise that safeguarding and child protection is an essential part of our duty of care to all students and all staff have a responsibility to provide a safe environment in which children can learn. We understand that safeguarding, child protection and promoting the welfare of all children is everyone's responsibility and everyone has a role to play in protecting children. We recognise that our school is part of a wider safeguarding system for children and work closely with other agencies to promote the welfare of children. We maintain an attitude of 'It could happen here' and will consider the wishes of, and at all times, what is in the best interests of each child.

2.2 The purpose of this policy is to;

- Promote safeguarding and child protection and to demonstrate Kingsbury Academy's commitment to keeping children safe;
- Provide all members of staff with the information required to meet their safeguarding duty and protect children from harm;
- Provide stakeholders with clear information relating to Kingsbury Academy's safeguarding and child protection procedures;
- Ensure that staff understand, can recognise and can respond to the indicators of abuse;
- Ensure that all staff are aware of their mandatory reporting duty in relation to Section 5B of the Female Genital Mutilation Act 2003; and
- Ensure that children are protected from maltreatment or harm.

2.3 Kingsbury Academy is committed to the following principles;

- All children have the right to be protected from harm.
- Children should feel safe and secure and cannot learn unless they do so.
- All staff are responsible for keeping children safe and have a responsibility to act if they think a child is at risk of harm.
- All staff take on a responsibility to promote children's welfare
- Working with other agencies is essential to promote safeguarding and protect children from harm.
- Early help and providing support to families and/or children as soon as a problem emerges is essential to improving outcomes for children and families.

## **2.4 Safeguarding aims**

2.4.1 The safeguarding aims of Kingsbury Academy, in line with Keeping Children Safe in Education (September 2021) are to;

- work to identify children who are suffering or likely to suffer abuse, exploitation or neglect and act to protect them;
- work with relevant services and agencies to ensure that children are protected from harm;
- provide a learning environment for children which is safe and secure;
- teach children how to keep themselves safe and provide structures for them to raise concerns if they are worried or at risk of harm;
- support children's mental health and wellbeing;
- ensure that we adhere to safer recruitment guidance and legislation, deal promptly with allegations of abuse against staff and take bullying and harassment seriously;
- train staff effectively in all safeguarding issues (including online safety) and in their responsibilities for identifying and protecting children that are or may be at risk of harm;
- have a designated safeguarding lead and designated deputies, who will provide support to staff, students and families;
- recognise that all children may be vulnerable to abuse, but be aware that some children have increased vulnerabilities due to special educational needs or disabilities;
- maintain a robust recording system for any safeguarding or child protection information;
- ensure that everyone in Kingsbury Academy- understands the safeguarding procedures; and to
- regularly review policies and procedures to ensure that children are protected to the best of our ability.

## **2.5 This policy adheres to the following documents;**

- [Keeping Children Safe in Education \(2021\)](#)

- [Working Together to Safeguard Children \(Parts updated December 2020\)](#)
- [Guidance for Safer Working Practice for those working with children and young people in education settings \(May 2019\)](#)
- [Guidance for Safer Working Practice for those working with children and young people in education settings addendum \(April 2020\)](#)
- [What to do if you are worried a child is being abused: Advice for practitioners \(2015\)](#)
- [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges \(September 2021\)](#)

**2.6** Keeping Children Safe in Education remains in force throughout the Covid-19 emergency period. In addition, we have regard to non-statutory interim guidance on safeguarding schools, colleges and other providers during the coronavirus outbreak. We continue to work closely with the Local Authority and the Coventry Safeguarding Children Partnership to safeguard children during this time.

**2.7** Please note that there are a number of other documents (statutory and non-statutory) that inform our policy and practice. A list of these can be found in Annex B of Keeping Children Safe in Education (September 2021).

**2.8** This policy should be read in conjunction with the following policies;

See Appendix A where links to these policies can be found

## **2.9 Scope**

2.9.1 This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, governors, volunteers and trustees working in or on behalf of Kingsbury Academy and Thrive Education Partnership Trust. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned, unless otherwise stated.

2.9.2 Rather than duplicating content from Keeping Children Safe in Education (September 2021) in this policy, it should be understood that Kingsbury Academy will always refer to this document as the benchmark for all safeguarding practice.

## **3. Roles and Responsibilities**

### **3.1 The Role of the Governing Body**

3.1.1 The school has a senior board level lead to take leadership responsibility for safeguarding. This role is carried out by Sean Bryne. Part 2 of Keeping Children Safe in Education (September 2021) sets out the responsibilities of governing bodies. As part of these overarching responsibilities the Governing Body will;

- Have a strategic leadership responsibility for Kingsbury Academy safeguarding arrangements;
- Ensure that they comply with their duties under legislation;
- Ensure a whole school approach to safeguarding, including the use of mobile technology in school;
- Ensure that policies, procedure and training in Kingsbury Academy are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner;
- Ensure that Kingsbury Academy takes into account local authority and Coventry Safeguarding Children Partnership policies and supply information as requested by the safeguarding partners (the Local Authority, a clinical commissioning group for an area within the local authority and the chief office of police for a police area within the local authority);
- Ensure that Kingsbury Academy has an effective child protection policy, that it is published on Kingsbury Academy's website or available by other means and review this annually;
- Ensure that Kingsbury Academy has a staff behaviour policy or Code of Conduct;
- Ensure that all staff undergo safeguarding and child protection training on induction (including online safety);
- Ensure Kingsbury Academy contributes to multi-agency working in line with statutory guidance;
- Ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems;
- Ensure that children are taught about safeguarding, including online safety as a whole school approach and curriculum planning but recognising that a one size fits all approach may not be appropriate for all children. See section 12 of this policy for further information;
- Put in place appropriate safeguarding responses for children who go missing from education;
- Appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead;
- Understand the local criteria for action and local protocol for assessment;
- Recognise the importance of information sharing between practitioners and local agencies;
- Ensure that appropriate filters and monitoring systems are in place to keep children safe online; and
- Respond to allegations of abuse against the headteacher whilst ensuring there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff, volunteers and contractors).

## 3.2. The Role of the Headteacher

### 3.2.1 The headteacher will;

- Ensure that this policy is reviewed annually, at minimum, and ratified by the governing body;
- Ensure that this policy and associated procedures are adhered to by all staff;
- Ensure that all staff are made aware of the named governor for safeguarding and the Designated Safeguarding Lead;
- Ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description;
- Decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead;
- Organise appropriate cover for the role of Designated Safeguarding Lead for any out of hour/out of term activities;
- Appoint a 'Designated Teacher for Looked-After and Previously Looked-After Children' to promote the educational achievement of children looked after;
- Appoint a lead for online safety;
- Promote a whole school approach to safeguarding;
- Promote resilience to social and emotional wellbeing, which is tailored to the needs of the children;
- Ensure that all recruitment follows the 'Safer Recruitment' guidance and a single, central record is maintained with details of all members of staff who are in contact with children;
- Respond to allegations of abuse against all other members of staff including supply staff, volunteers and contractors;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- Ensure that the school works with Children's Services, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;
- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012); and
- Ensure that Children's Services (from the host local authority or placing authority) have access to Kingsbury Academy to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2021).

### 3.3 The Role of the Designated Safeguarding Lead

3.3.1 The Designated Safeguarding Lead for Kingsbury Academy is Andrea Davis. The Designated Safeguarding Lead will;

- Take overall lead responsibility for safeguarding and child protection (including online safety) in Kingsbury Academy;
- Liaise with the safeguarding partners and work with other agencies in line with Working Together to Safeguard Children (2020);
- Always be available during term time (during school hours) for staff in Kingsbury Academy to discuss safeguarding concerns. In the event that they are not available, a deputy will be made available;
- Undergo training to provide them with the knowledge and skills required to carry out this role and update this every two years;
- Act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty;
- Be best placed to advise on the response to safeguarding concerns;
- Identify if children may benefit from early help;
- Act as a point of contact with the safeguarding partners;
- Make referrals to Coventry's Multi-Agency Safeguarding Hub (MASH) where children are at risk of significant harm.
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel;
- Support the school with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation;
- Refer cases to the police where a crime may have been committed<sup>1</sup>;
- Ensure all staff have read and understood Part 1 and/or Annex A of Keeping Children Safe in Education (September 2021);
- Update their knowledge and skills regularly and keep up with any developments relevant to their role;
- Provide staff in school with the knowledge, skills and support required to safeguard children;
- Take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files;
- Take responsibility for the transfer of safeguarding files when a child leaves Kingsbury Academy;
- Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings;
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children;



- Work closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded;
- Help to promote educational outcomes of child who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with teachers and the school leadership team;
- Promote a 'culture of safeguarding', in which every member of Kingsbury Academy community acts in the best interests of the child;
- Ensuring the school knows who its cohort of children or have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations;
- Regularly meet with the safeguarding link governor and/or Chair of Governors to review safeguarding in Kingsbury Academy; and
- Liaise with the headteacher regarding safeguarding cases and issues.

3.3.2 Further details on the role of the Designated Safeguarding Lead can be found in Annex C of Keeping Children Safe in Education (September 2021).

### **3.4 The Role & Responsibilities of all Staff within School**

3.4.1 School staff play a particularly important role because they are in a position to identify concerns early in order to provide help for children. All staff in Kingsbury Academy;

- Have a responsibility to provide a safe environment, where children can learn;
- Should know what to do if a child tells them that he/she is being abused, exploited or neglected;
- Will be able to identify indicators of abuse;
- Will be made aware of; the safeguarding and child protection policy; the school behaviour policy; the staff code of conduct; information about the safeguarding response to children missing in education; the role of the designated safeguarding lead and systems in Kingsbury Academy that support safeguarding and child protection;
- Will be provided with a copy of Part 1/Annex A of Keeping Children Safe in Education (September 2021) annually and receive annually updated training on their safeguarding roles and responsibilities;
- Should have an awareness of safeguarding issues that put children at risk of harm and behaviours associated with these risks;
- Should know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- Will be made aware of the early help process and understand their role in it;
- Should be prepared to identify children who may benefit from early help and will discuss early help requirements with the safeguarding lead in the first instance;

- May be required to support social workers and other agencies following a referral;
- Will be made aware of the process for making referrals to Children's Services (through the MASH), understand statutory assessments and the role that they may be expected to play in such assessments;
- Should be prepared to make referrals to the MASH if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments;
- Will receive regularly updated safeguarding and child protection training including online safety;
- Will receive safeguarding updates throughout the year as part of continuous professional development;
- Should be able to contribute to the development of safeguarding policy and practice.
- Should always seek advice from the Designated Safeguarding Lead if they are unsure; and
- All teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

### **3.5 Multi-Agency Working**

3.5.1 The school is committed to multi-agency working and operates under Working Together to Safeguard Children (2018) and local safeguarding arrangements.

3.5.2 The school will work with Children's Services the police, health services, local Early Help practitioners and other relevant agencies to promote the welfare of children and protect them from harm.

3.5.3 We work closely with our local Family Hub to ensure children receive appropriate, co-ordinated Early Help (Pathways Family Hub, Radford Primary School, Lawrence Saunders Rd, Coventry, CV6 1HD; Tel: 02476 788444).

3.5.4 The Coventry Safeguarding Children Partnership (CSCP) have designated that schools and colleges are a named 'relevant agency'. As such, the school is under a statutory duty to co-operate with published CSCP arrangements.

## **4. Types of abuse**

4.1 As outlined above, all staff will be trained in indicators of abuse and should be able to recognise signs of abuse. We recognise that abuse, neglect and safeguarding issues are complex and can rarely be covered by one label. Abuse can take many forms and can involve directly inflicting harm on a child or failing to protect a child from harm online as well as face to face.

The four main types of abuse that staff are trained to recognise are;

- Physical abuse;
- Sexual abuse;
- Emotional abuse;
- Neglect.

#### 4.2 Types of abuse (Taken from Keeping Children Safe in Education, 2021)

Type of abuse	Information
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.
Physical abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Emotional abuse	The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may

	<p>involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p>
Sexual abuse	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p> <p>The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of Kingsbury Academy's policy and procedures for dealing with it.</p>
Child sexual exploitation (CSE)	<p>CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, (b) for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been sexually exploited even if the sexual activity appears</p>

	<p>consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.</p>
Neglect	<p>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, for example, 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p>

**4.3** Indicators of abuse can be found in Appendix B.

**4.4** If a child is in immediate danger or at risk of harm, a referral will be made to Children's Services (through the MASH) and any member of staff can make this referral. A Designated or Deputy Designated Safeguarding Lead should be available at all times, but in exceptional circumstances the member of staff should speak to a member of the Senior Leadership Team or seek advice directly from Children's Service and then take appropriate action. The Designated Safeguarding Lead should be made aware as soon as possible.

**4.5** Staff, parents and the wider community should report any concerns that they have about the welfare of children, however minor or seemingly insignificant. Staff should not assume that someone else will report concerns.

**4.6** The school recognises that any child can be the victim of abuse and may benefit from early help. However, the school will be particularly vigilant to potential need for early help if a child;

- is disabled or has certain health conditions and has specific additional needs;

- has special educational needs (whether or not they have a statutory education, health and care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is a risk of modern slavery, trafficking, sexual or criminal exploitation;
- is misusing drugs or alcohol themselves;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is at risk of 'honour-based' abuse such as Female Genital Mutilation or Forced Marriage;
- is persistently absent from education, including persistent absences for part of the school day.
- is a privately fostered child.<sup>2</sup>

**4.7** Kingsbury Academy recognises that abuse can take many different forms. Staff will also receive training on the following issues and action will be taken if Kingsbury Academy believes that a child is at risk of or is the victim of;

- bullying, including cyber- or online-bullying;
- child criminal exploitation (including involvement in county lines);
- child sexual exploitation;
- domestic abuse;
- emotional abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- mental health;
- neglect;
- peer on peer abuse;
- physical abuse;
- radicalisation;
- relationship abuse;
- serious violence and harassment;

- sexual abuse;
- sexual violence or sexual harassment (including peer on peer abuse);
- sharing of consensual or non-consensual nude and semi-nude images/videos;
- So-called 'honour-based' abuse;
- trafficking and modern slavery.

**4.8** Kingsbury Academy will also take action to protect;

- Children missing education;
- Children missing from home or care.

4.8.1 There are other familial issues that can have a detrimental impact on children.

We work with other agencies in line with Keeping Children Safe in Education (2021) to support children and families in the following circumstances;

- Children facing the court procedures and/or children in the court system;
- Children with family members in prison;
- Children who are homeless;
- Children who need a social worker.

#### **4.9 Child potentially at greater risk of harm**

4.9.1 Kingsbury Academy recognises that some children need a social worker due to abuse, neglect or complex family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.

4.9.2 The Designated Safeguarding Lead will hold information relating to social workers working with children in the school.

4.9.3 This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

#### **4.10 Children missing from Education**

4.10.1 Kingsbury Academy understands that children missing from education can be a warning sign to a variety of safeguarding concerns.

4.10.2 Kingsbury Academy will report information to the Local Authority when removing a child from roll.

#### **4.11 Elective Home Education**

4.11.1 Kingsbury Academy recognises that many home educated children have a positive learning experience and the decision is one with the child's best interests at heart.

4.11.2 Since 2016, Kingsbury Academy has a statutory duty to inform the Local Authority of all deletions from roll. When Elective Home Education is the reason for this removal, the Local authority and other key professionals will work alongside Kingsbury Academy to coordinate a meeting with parents where possible ideally before a final decision is made.

#### **4.12 Mental Health**

4.12.1 The school recognise that safeguarding and promoting the welfare of children includes preventing the impairment of children's mental health or development.

4.12.2 All staff will be aware that mental health problems may be an indicator that a child is suffering or is at risk of suffering abuse, neglect or exploitation.

4.12.3 Staff will not attempt to make a diagnosis of a mental health problem unless they are appropriately trained.

4.12.4 We recognise that staff are well-placed to observe behaviour that may indicate that a child is experiencing a mental health problem, or is at risk of developing one. There are clear systems and processes in place for identifying possible mental health problems. If staff are concerned that a child is suffering a mental health problem, they should report this to the Lead or Deputy DSLs and record on CPOMS. DSLs will refer to external agencies, where appropriate.

4.12.5 If staff are concerned that a child is experiencing a mental health problem that is also a safeguarding concern, they must report this to the Designated Safeguarding Lead (or deputy Designated Safeguarding Lead) immediately.

4.12.6 Clair Nutt (AHT) is the designated member of staff responsible for the promotion of mental health and wellbeing across the school and will support staff to identify mental health concerns and strategies with pupils.

4.12.7 Further information, guidance and advice regarding mental health can be found in paragraph 41 of Keeping Children Safe in Education 2021.

4.13 Kingsbury Academy have a duty to refer any children who are living in a private fostering arrangement to the local authority.

4.14 All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have "due regard" to the need to prevent people from being drawn into terrorism. See Appendix B for further information on Kingsbury Academy's Prevent duty.

4.15 If any member of staff is unsure about signs of abuse or neglect, they should speak to the Designated Safeguarding Lead.

4.16 See Appendix B for further information and guidance on the above issues.



## 5. Responding to signs of abuse

5.1 If a member of staff, parent or member of the public is concerned about a child's welfare, they should report it to the designated safeguarding lead as soon as possible. On occasions when the designated safeguarding lead is not available, it should be reported to the deputy safeguarding lead without delay. Although any member of staff can make a referral to Children's Services where possible there should be a conversation with the Designated Safeguarding Lead.

5.2 If anyone other than the Designated Safeguarding Lead makes a referral to Children's Services or to the police, they should inform the DSL as soon as possible.

5.3 All staff will be alert to indicators of abuse and will report any of the following to the Designated Safeguarding Lead immediately;

- Any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- Any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories.
- Any significant changes in attendance or punctuality;
- Any significant changes in a child's presentation;
- Any concerns relating to people who may pose a risk of harm to a child; and/or
- Any disclosures of abuse that children have made.

5.4 There will be occasions where a child discloses abuse directly to a member of staff. If this happens, the member of staff will;

- listen carefully to the child and believe what they are saying;
- not promise confidentiality, as information may need to be passed on so the child and family can receive additional support;
- only ask for clarification if something is unclear and will not ask 'leading' questions;
- report disclosure to the designated safeguarding lead as soon as possible, certainly by the end of the day;
- only discuss the issue with colleagues that need to know about it; and
- will write up the disclosure and pass it to the designated safeguarding lead. It is likely they will have a discussion with the DSL prior to this.

5.5 The designated safeguarding lead will make a decision about the action that needs to be taken following a member of staff raising a concern about a child or following a direct disclosure. The DSL may;

- Manage support for the child internally;

- Seek advice from the social worker advice line in the MASH;
- Instigate single agency intervention and work directly with the family to improve the situation;
- Offer an Early Help Assessment to provide multi-agency help to a family;
- In cases where children are deemed to be at significant risk of harm, the DSL will refer cases to the MASH for statutory intervention. Parental consent will be obtained wherever possible before referring cases to the MASH. However, if Kingsbury Academy is worried that telling parents will mean the child is at greater risk of harm, we may do this without informing them.
- If parents do not consent to a referral but the school believes that a child is at significant risk of harm, a referral will still be made to Children's Services.

5.6 For further information about the Coventry Safeguarding Children Partnership's 'Right Help, Right Time' guidance, which is used by Kingsbury Academy to make decisions about protecting children, please visit <http://www.coventry.gov.uk/righthelprighttime>.

5.7 See page 21 for flowchart of actions that will be taken where there are concerns about a child (taken from Keeping Children Safe in Education, September 2021).

5.8 In cases where members of staff become aware that Female Genital Mutilation (FGM) has been carried out on a female below the age of 18, they have a mandatory duty to report this to the police without delay and will do so. Staff should refer this to the DSL, but the legislation requires regulated health and Children's Service professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either;

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

## **5.9 Peer on Peer Abuse**

5.9.1 Kingsbury Academy understands that both adults and other children can perpetrate abuse and it can happen inside and outside of school. Peer on peer abuse is taken very seriously. Peer on peer abuse can include bullying (including cyber-bullying, prejudice-based and discriminatory bullying), abuse in intimate personal relationships between peers, physical abuse, sharing of consensual or non-consensual images of videos, causing someone to engage in sexual activity without consent, sexual violence and/or harassment,

upskirting, and initiation/hazing ceremonies. The school recognise that safeguarding issues can manifest as peer on peer abuse.

5.9.2 All members of staff will be made aware of the school's policy and procedures with regards to peer on peer abuse. The school will ensure staff understand what is meant by peer on peer abuse and the school policy on peer on peer abuse by INSET training and Safeguarding training updates.

5.9.3 The school will work to prevent peer on peer abuse by:

- providing appropriate and regularly updated staff training.
- Making sure staff challenge inappropriate behaviours
- Ensuring our curriculum addresses issues that are associated with peer-on-peer abuse and teaches children about safeguarding, including how to stay safe online.
- Considering our context and working with local partners
- RSHE and PSHE policies and provision

5.9.4 In the event that an allegation of peer on peer abuse is made, Kingsbury Academy will investigate this by:

- Managing support for the children involved internally;
- Seeking advice from the social worker advice line in the MASH;
- Instigate single agency intervention and work directly with the child/children/family to improve the situation;
- Offer an Early Help Assessment to provide multi-agency help to a child/family;
- In cases where children are deemed to be at significant risk of harm, the DSL will refer cases to the MASH for statutory intervention.
- Parental consent will be obtained wherever possible before referring cases to the MASH. However, if Kingsbury Academy is worried that telling parents will mean the child is at greater risk of harm, we may do this without informing them.
- If parents do not consent to a referral but the school believes that a child is at significant risk of harm, a referral will still be made to children's social care.
- Kingsbury Academy will ensure the children involved will be kept apart – and next steps / ways forward discussed.

5.9.5 In the event that an allegation of peer on peer abuse is made, victims and alleged perpetrators will be supported by taking into consideration:

- Kingsbury Academy will ensure the children involved will be kept apart – and next steps / ways forward discussed.
- A thorough investigation will be completed and recorded within the school files (CPOMS)

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- That pupils with SEN can be 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.<sup>1</sup>

5.9.6 Kingsbury Academy will never pass off peer on peer abuse as 'banter' or 'part of growing up' and recognise that even if there are no reported cases, such abuse may still be taking place. This should be a Zero-tolerance approach as this could lead to a culture of unacceptable behaviours.

5.9.7 The students at Kingsbury Academy may need support to communicate any reports of abuse and specific members of staff may need to be used to ensure they are able to communicate in the best manner or communication strategy. Other students with ASC and or SEMH may only be able to communicate their concerns with specific members of staff they are comfortable with. Staff will need to be additionally vigilant with students who have learning difficulties that impact on their ability to understand socially acceptable behaviours or manage their impulses. Kingsbury Academy is aware that children with additional needs or disabilities may be more vulnerable to abuse and additional barriers may exist when recognising abuse and neglect.

Staff will be trained in recognising signs of abuse in children with SEN and disabilities.

Kingsbury Academy is a broad spectrum, primary age special school. The school takes account of the fact that while children fall within the age range of 5-11, many have varying developmental ages and cognitive abilities. This would always be taken into account when teaching children about peer on peer abuse and in dealing with any allegations made.

Staff will take into account the needs of a child when responding to concerns of abuse or when taking a disclosure. We recognise that some children require specialist intervention to communicate and advice from the DSLs will be sought in these circumstances.

Safeguarding learning opportunities within the curriculum will be appropriately differentiated to ensure all children can access it.

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5.9.8 Kingsbury Academy will adhere to guidance set out in Keeping Children Safe in Education (2021) and Sexual Violence and Sexual Harassment in Schools (September 2021) when responding to incidents of peer on peer abuse.

5.9.9 All staff will be made aware that 'upskirting' is a criminal offence.

### **5.10 Sharing of consensual or non-consensual nude and semi-nude images or videos**

5.10.1 "Sharing of consensual or non-consensual nude and semi-nude images or videos" refers to any sharing of youth-produced sexual imagery between children. This includes;

- A person under the age of 18 creating and sharing sexual imagery of themselves with a peer under the age of 18;
- A person under the age of 18 sharing sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
- A person under the age of 18 being in possession of sexual imagery created by another person under the age of 18.

5.10.2 The school has a responsibility to educate children in the risks relating to 'sharing consensual or non-consensual nude images or videos' and how to keep themselves safe online. (See Online Safety Policy/PHSE policy).

5.10.3 Any incidents or suspected incidents of 'sharing consensual or non-consensual nude images or videos' should be reported to the DSL without delay.

5.10.4 Once reported to the DSL, the DSL will decide on the appropriate course of action. This could include;

- Referrals to the MASH in regards to both peers (also the police if urgent response required);
- Confiscation of mobile phones in line with guidance 'Searching, Screening and Confiscation, (January 2018);
- Support for young people involved to prevent reoccurrence;
- Sanctions in accordance with behaviour policy;

5.10.5 Any incidents of 'sharing consensual or non-consensual nude images or videos' involving the following will result in a MASH and sometimes a Police referral;

- Adult involvement;
- Coercion or blackmail;
- Children under the age of 13;
- Extreme, or violent content;
- Immediate risk of harm.

5.10.6 Staff will not view images or videos on pupil devices. Confiscated devices will be stored securely and passed to the relevant agencies.

5.10.7 We will work with parents as necessary if their child is involved in the sharing of consensual or non-consensual nude images or videos.

5.10.8 We operate a culture of safeguarding and young people should feel confident to disclose if they have sent an inappropriate image of themselves. Children will always be supported to retrieve and delete the images.

## **5.11 Peer on Peer Sexual Violence and Sexual Harassment**

5.11.1 Sexual Violence and sexual harassment, just like the above types of Peer on Peer abuse, can occur both in and out of school (online and face to face) between children of any age and sex and is never acceptable. This includes children from Primary school through to Secondary and higher. Examples of this are:

- rape;
- assault by penetration;
- sexual assault;
- causing someone to engage in sexual activity without consent;
- sexual comments including on social media;
- sexual jokes;
- physical behaviour;
- online sexual harassment;
- sharing of unwanted explicit content;
- upskirting;
- sexualised online bullying;
- sexual exploitation, coercion and threats.

All members of staff at Kingsbury Academy maintain the attitude of 'It can happen here' to ensure all children are safeguarded. One way this is done is by addressing inappropriate behaviour (see behaviour policy). All staff understand that by not addressing this promptly, children's educational attainment may be impacted if the alleged perpetrator attends the same setting.

5.11.2 Kingsbury Academy will reassure the victim that they are being taken seriously and will be support and kept safe. The Designated Safeguarding Lead (or deputy) will take a lead role on reports whilst using their professional judgement, and liaising with other agencies by following the below protocol;

- when possible, two members of staff will be present where the report includes an online element. Staff will not view illegal images of children;
- will not promise confidentiality as reports will need to be passed onto Children's Service (and in some cases, the Police);

- recognises that a child is more likely to disclose to a member of staff they have the strongest relationship with;
- an initial disclosure may be the first incident that is reported rather than a singular event;
- some children may face barriers to disclosing such as, additional needs, vulnerability, sex, ethnicity and possibly sexual orientation;
- will always listen carefully to the child whilst being non-judgemental;
- write up the factual parts of the disclosure as soon as the child has finished disclosing;
- liaise with the MASH (and police if urgent response required).

5.11.3 Nevertheless, the victim will never be given the impression that they are creating a problem by reporting sexual violence and/or harassment. Staff will be aware of the importance of challenging inappropriate behaviours; making it clear it is never accepted, tolerated and is not a part of growing up or banter.

5.11.4 In some cases, a risk assessment may be required but will be kept under constant review.

## **5.12 Serious Violence**

5.12.1 All staff will be made aware of indicators, which may signal that children are at risk of, or are involved with serious violent crime such as absence from school, a change in friendship/relationship, a significant decline in performance, signs of self-harm or change in wellbeing, or sign of unexplained injury.

5.12.2 All staff will be made aware of the range of risk factor which will increase the likelihood of involvement in serious violence, criminal networks and gangs and understand the measures in place to prevent these.

5.12.3 All staff will have an awareness of Child Criminal Exploitation and behaviours linked to Child Criminal Exploitation. Further information about Child Criminal Exploitation can be found in paragraph 51 of Keeping Children Safe in Education (2021).

## **5.13 Searching, Screening and Confiscation**

5.13.1 Where necessary, searching, screening and confiscation will be used to safeguard a child/children in Kingsbury Academy.

5.13.2 Kingsbury Academy adheres to 'Searching, Screening and Confiscation: Advice for Schools (January 2018).

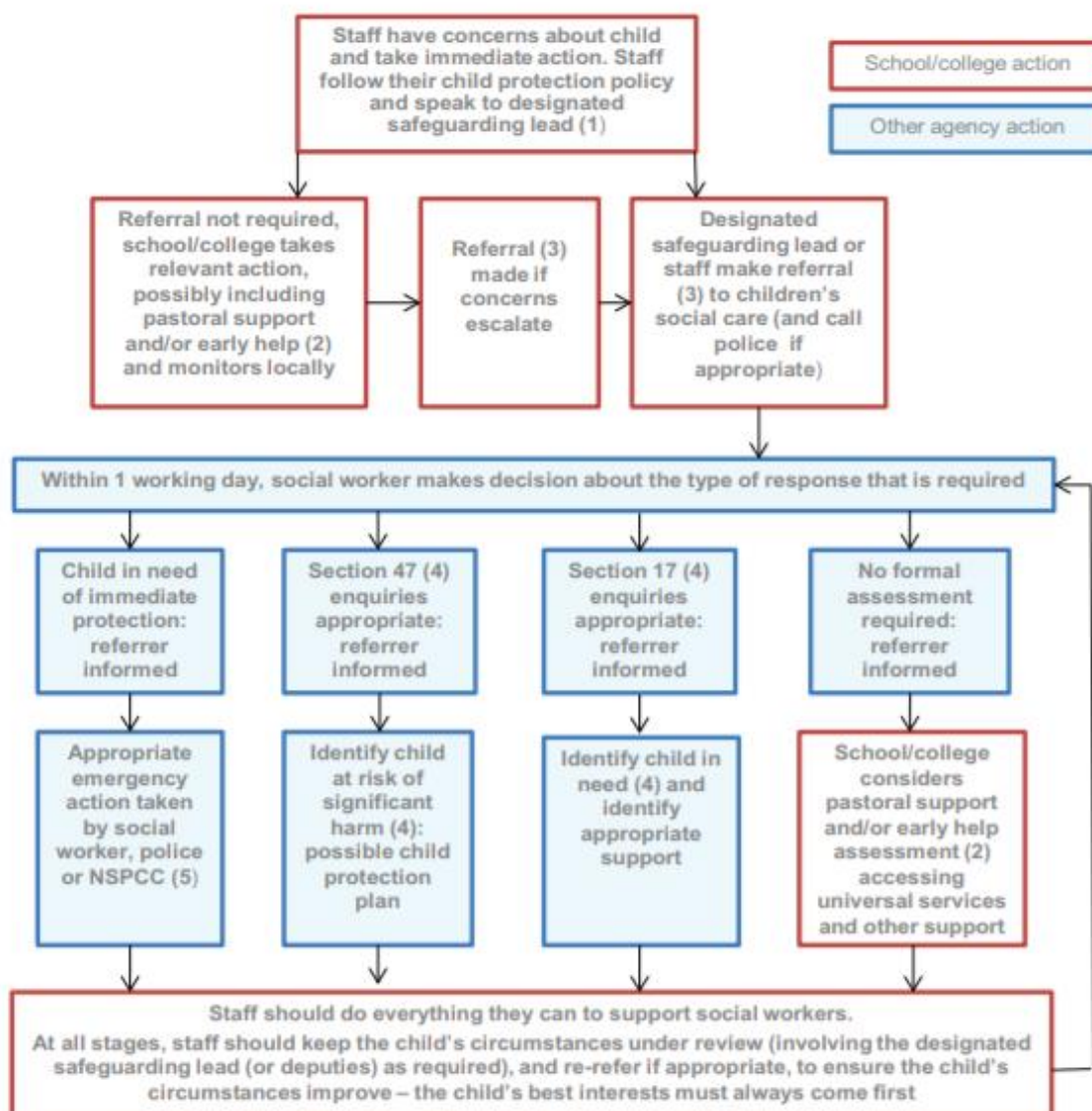
## **5.14 Extra-Familial Harm**

5.14.1 Kingsbury Academy recognises that safeguarding incidents can be associated with factors outside the school and may take place outside of school. We also recognise that safeguarding incidents or behaviours can

occur between children outside of school. We will always consider contextual safeguarding factors when responding to safeguarding incidents.

5.14.2 All staff will be made aware that safeguarding incidents and/or behaviours can be associated with factors outside the Kingsbury Academy and/or can occur between children outside these environments.

### **Actions where there are concerns about a child**



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).



5.15 To raise concerns about children, members of staff should contact the Multi-Agency Safeguarding Hub (MASH) by telephone to discuss the referral. They should then complete the online Multi-Agency Referral Form (MARF) and submit this to the MASH. The school will follow up referrals if we do not receive feedback from Children's Services.

**MASH Telephone number:** 02476 788 555

**MASH online referral form:** <http://www.coventry.gov.uk/safeguardingchildren>

**Out of hours Emergency Duty Team:** 02476 832 222

**Prevent/Channel Referrals:** Refer to MASH ([mash@coventry.gov.uk](mailto:mash@coventry.gov.uk)) and to [CTU\\_GATEWAY@west-midlands.pnn.police.uk](mailto:CTU_GATEWAY@west-midlands.pnn.police.uk)

**5.16 If a child's situation does not appear to be improving following a referral, the school may re-refer the child. We will also consider using the Coventry Safeguarding Children Partnership's Managing Professional Disagreements policy ([LINK UPDATED](#)), to ensure that our concerns have been addressed and that the situation improves for the child.**

## **6. Record-keeping**

6.1 Information will be kept confidential and stored securely.

6.2 A written record of all safeguarding and/or child protection concerns, discussions and decisions made will be kept in individual children's files. This will be separate from the main school file and will only be accessed by the relevant safeguarding staff.

6.3 Kingsbury Academy keeps all safeguarding files electronically, using a system called CPOMs.

6.4 Staff will submit all concerns in writing to the DSL at the earliest opportunity. This may be after having a verbal conversation, but conversations will also be followed up with a CPOMS report.

6.5 In the event that a child moves school, the safeguarding file will be transferred to the new setting securely and separately from the main school file. Once received by the new school, this school will not retain the information.

6.6 The school will seek at least two emergency contacts for every child.

6.7 All data processed by Kingsbury Academy is done so in line with the General Data Protection Guidelines and the Data Protection Act (2018). Please see the following policies for additional information; <https://www.kingsbury.thrive.ac/wp-content/uploads/2020/07/Data-Protection-Policy.pdf>; <https://www.kingsbury.thrive.ac/wp-content/uploads/2020/09/Employee-privacy-notice.pdf>;

<https://www.kingsbury.thrive.ac/wp-content/uploads/2020/09/GDPR-Special-category-data-policy.pdf>;

6.8 Further information regarding information sharing and data processing in relation to safeguarding can be found in Part One of Keeping Children Safe in Education (September 2021).

## **7. Photography and Images**

7.1 Consent from parents to photograph children at school events for promotional reasons will be sought when the child joins Kingsbury Academy. This information is collected annually

7.2 Parents can withdraw consent at any time and must notify Kingsbury Academy if they do not wish their child's photographs to be used.

7.3 Photographs of children used publicly will not be displayed with their name or other personal information.

7.4 Photographs of children will be processed in line with the General Data Protection Regulation.

## **8. Early Help**

8.1 Kingsbury Academy is committed to supporting families as soon as a possible problem arises. It is more effective to support a family through early help than reacting to a problem later. Everyone who comes into contact with children and their families and carers have a role to play in safeguarding children. Kingsbury Academy works closely with its neighbouring family hub to work with families in the community to improve outcomes for children.

- [Aspire Family Hub](#)
- [Families for All Hub](#)
- [Harmony Hub](#)
- [Mosaic Family Hub](#)
- [Park Edge Family Hub](#)
- [Pathways Family Hub](#)
- [The Moat Family Hub](#)
- [Wood Side Family Hub](#)

8.2 Kingsbury Academy works within the Coventry Safeguarding Children Partnership's '[Right Help, Right Time](#)' framework, available on the CSCP website.

## **9. Staff training**

9.1 In order for staff to be able to understand and discharge their safeguarding and child protection duties, Kingsbury Academy has committed to training staff throughout the academic year. All staff members will be made aware of Kingsbury Academy's safeguarding processes and structures and will receive

training on these as part of their induction. As part of this training and their annual refresher, they will also receive;

- This 'Safeguarding and Child Protection Policy';
- The staff Code of Conduct
- Copies of Part 1 and Annex B of Keeping Children Safe in Education (September 2021)
- School procedures for Children Missing Education
- The school Behaviour Policy

9.2 Staff at Kingsbury Academy will undertake the following training during the year.

- Safeguarding / Health & Safety / Fire Awareness/ DSL briefings/ Governors Training (see Governors Hub) Sensory Curriculum / First Aid / CPOMS, RWInc /SALT/OT- any other training required will be discussed with The Head Teacher and Governors.

9.3 Kingsbury Academy recognise that children may engage in risky behaviours that may put them at additional risk of danger. These can include drug taking, alcohol abuse, truanting and the sharing of consensual or non-consensual nude images or videos<sup>5</sup>. Staff will be training in these areas in order to be able to further recognise if a child is at risk of harm.

## **10. Safer Recruitment**

10.1 Kingsbury Academy is committed to providing children with a safe environment, in which they can learn. We take safer recruitment seriously and all staff are subject to the following checks;

- Identity check, including birth certificate wherever possible;
- DBS clearance;
- Prohibition from teaching checks (where required);
- Barred List check;
- Section 128 checks (as required - leadership and management);
- Reference check (two references required);
- Professional qualifications check ;
- Right to work in the UK check;
- Further checks for those who have lived outside the UK;
- Disqualification Under the Childcare Act 2006 checks (as required).
- Verification on the candidate's mental and physical fitness may also be checked.

10.2 A record of all checks on members of staff will be held on the Single Central Record.

10.3 All new members of staff will be required to obtain DBS clearance. Kingsbury Academy reserves the right to re-check DBS clearance for any

member of staff where information is received that indicates that they may pose a risk to children and may ask candidates to be registered on the DBS update service.

10.4 At least one member of every interview panel will have undergone Safer Recruitment training which will be refreshed every 2 years.

10.5 We take proportionate decisions on whether to check individuals beyond what is required.

10.6 Any visitor to the school who has not been subject to the necessary checks will be supervised at all times and risk assessed.

10.7 All safer recruitment practices at Kingsbury Academy comply with Keeping Children Safe in Education (September 2021). See Part 3 of Keeping Children Safe in Education (September 2021) for further information.

10.8 See Safer Recruitment policy for further details.

## **11. Allegations of abuse against staff**

11.1 Kingsbury Academy takes all safeguarding concerns and/or allegations against staff seriously and will manage them in line with this policy, Part Four of Keeping Children Safe in Education (September 2021) and the CSCP Guidance, [‘Allegations Against Staff and Volunteers’](#). [LINK UPDATED](#)

11.2 Allegations or concerns may include

- Staff having behaved in a way that has harmed a child, or may have harmed a child;
- Staff possibly committing a criminal offence against or related to a child;
- Staff behaving towards a child or children in a way that indicates that he or she may pose a risk of harm to children; or
- Staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children (including behaviour outside of work). This is known as ‘Transferable risk’.

11.3 If a concern or allegation of abuse arises against the Headteacher, it must be reported to the CEO of TEP Trust, Richard Chapman, without delay.

11.4 If a concern or allegation of abuse arises against any member of staff, supply teacher, volunteer or contractor other than the Headteacher, it must be reported to the Headteacher without delay.

11.5 Concerns or allegations of abuse against staff must be reported to the Headteacher and not discussed directly with the person involved.

11.6 The Headteacher should consider if the concern or allegation meets the threshold for Designated Officer intervention. The details of the LADO can be found at the front of this policy.

11.7 Concerns relating to a position of trust issue will be referred to the Local Authority designated officer within immediately.

11.8 If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made.

11.9 In the instances where an allegation is dealt with internally, the Local Authority designated officer will provide information and support to Kingsbury Academy in managing the allegation.

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

## **12 Supply Teachers and all contracted staff**

12.1 Although the school does not directly employ supply teachers and contractors, the school will ensure that any concerns or allegations are handled properly.

12.2 The school will never cease to use a supply teacher for safeguarding reasons without liaising with the Local Authority Designated Officer and reaching a suitable outcome.

12.3 Governing bodies will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation.

12.4 The school will inform supply agencies of its process for managing allegations, including inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant school policies. The school will usually take the lead because agencies do not have direct contact with children or staff, so will not be able to collect facts.

## **13 Low-level concerns**

In line with Section Two of Part Four of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored and reinforced by staff.

### **Definition of low-level concerns**

The term 'low-level' concern does not mean that the concern is insignificant, it means that the threshold set out at the start of this section has not been met. A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an

adult working in or on behalf of the school or college may have acted in a way that:

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

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

- being over friendly with children
- having favourites
- taking photographs of children on a personal mobile phone
- 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.

Such behaviour can exist on a spectrum.

### **Sharing low-level concerns**

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the headteacher. Any concerns about the headteacher should be reported to the CEO of the Trust; Richard Chapman.

### **Recording low-level concerns**

All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action taken. Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation. 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, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a concern to meeting the harms threshold.

### **Low-level concerns and references**

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

## **13.1 Governors**

11.13.1 If an allegation or concern is about a Governor, the Head Teacher will alert the CEO of TEP Trust.

### **13.2 Volunteers**

11.14.1 Risk assessments and a DBS check will be requested for all volunteers. Under no circumstances will a volunteer whereby no checks have been carried out will be alone with children or allowed to work in regulated activity.

### **13.3 Whistleblowing**

11.15.1 Kingsbury Academy operates a culture of safeguarding and all staff should report any concerns about poor or unsafe practice, or Kingsbury Academy's safeguarding processes to the senior leadership team.

11.15.2 The senior leadership team will take all concerns seriously.

11.15.3 In the event that a member of staff is unable to raise an issue with senior leadership in school, they should refer to Part 1 of Keeping Children Safe in Education for additional guidance on whistleblowing procedures.

## **14 Promoting safeguarding and welfare in the curriculum**

14.1 Kingsbury Academy recognises the importance of teaching children how to stay safe and look after their mental health and are committed to equipping children with the skills and knowledge to have successful and happy lives.

14.2 The school will teach children about safeguarding, including online safety. As part of a broad and balanced curriculum, the school will cover relevant issues in line with government guidance on Relationships Education, Relationships and Sex Education and Health Education

14.3 Children at Kingsbury Academy will receive the following as part of our promotion of safeguarding across the curriculum:

- Explicit PSHE/RSE lessons within the curriculum
- Raise awareness through assemblies and newsletters
- Participating in key events such as 'Anti-bullying' week & 'Safer Internet Day'
- Agenda item for school council
- Participation in local and National Safeguarding events such as NSPCC PANTS campaign

Listening to the voice of the child can be difficult for children with communication issues so a variety of strategies are used such as Talking Mats, observations, choice making and 1-1 discussions.

14.4 Education at home and remote learning

Online learning for pupils is accessed via the Kingsbury Academy website. All information uploaded complies with the Academies 'Acceptable use of ICT policy', 'Online safety policy' and 'Safeguarding Policy.

### **15 Children Looked After**

15.1 The most common reason for children to be looked-after is because they have experienced abuse and/or neglect. Kingsbury Academy recognises that children looked after may have additional vulnerabilities. The Designated Lead for Looked-After and Previously Looked-After Children is Susannah Roberts

15.2 Staff will receive training on how to best safeguard children who are Looked-After and Previously Looked-After.

15.3 The school will work with Personal Advisors when children leave care (where applicable).

15.4 Kingsbury Academy is committed to working with other agencies to ensure the best outcomes for Looked-After and Previously Looked-After children.

### **16 Children with Special Educational Needs and Disabilities or physical health needs**

16.1 As outlined in Keeping Children Safe in Education (2021), Kingsbury Academy is aware that children with additional needs or disabilities may be more vulnerable to abuse and additional barriers may exist when recognising abuse and neglect. This could be because;

- 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 or bullying than other children;
- the potential for children with SEN and disabilities or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.<sup>6</sup>

16.2 Staff will be trained in recognising signs of abuse in children with SEN and disabilities or certain medical conditions.

16.3 Staff will take into account the needs of a child when responding to concerns of abuse or when taking a disclosure. We recognise that some children require specialist intervention to communicate and advice from the SENCO will be sought in these circumstances.

16.4 Safeguarding learning opportunities within the curriculum will be appropriately differentiated to ensure all children can access it.



## 17 Use of reasonable force

17.1 There may be occasions when staff are required to use reasonable force to safeguard children. We will not use any more force than is necessary.

The use of reactive strategies may be necessary when all other primary and secondary preventative measures have been unsuccessful in order to ensure safety for the individual, staff, other pupils or the public. Good practice dictates that any reactive strategy should be tailored to meet the needs of the individual pupil and used as a gradient of support as a last resort. The agreed use of any reactive strategy should be clearly identified and recorded in the pupils Behaviour Support Plan. This will be completed in collaboration with staff involved in supporting the pupil and other professionals as appropriate. If physical intervention is needed in a crisis situation (and is unplanned) then the BSP must be reviewed, and this must be written into the plan. The BSP should be reviewed after any physical intervention with a plan to reduce the need for this. Kingsbury Academy train staff in effective recording methods and conduct periodic checks to ensure the reliability and validity of ongoing records. They must respond swiftly and effectively to any escalating patterns of use, identifying root causes and taking appropriate corrective actions.

### **Reactive strategies must:**

- Not be used in isolation but always be used in conjunction with positive behavioural procedures
- Follow a gradient of support, with the least intrusive procedure always being the first option
- They must only be used as a last resort when all other strategies have proved unsuccessful
- They must only be used for the minimum amount of time necessary to deal with the immediate situation
- Not be used as punishments or rewards
- Be tailored to meet individual need and prescribed on an individual basis only
- Use the minimal amount of force necessary in any given situation
- Be proportionate to the immediate situation
- Focus on giving control back to the pupil as quickly as possible
- Avoid the use of pain compliance
- Not employ potentially dangerous positions that may compromise the health and wellbeing of the pupil
- Avoid vulnerable parts of the body (neck, chest, groin). Avoid hyper extension and/or hyper flexion of the joint
- Not impede the process of breathing
- Be capable of being performed by all key staff
- Be regularly reviewed
- Take into consideration all possible contra-indications and/or complications

- Be routinely assessed following their use for any signs of injury or psychological distress to the pupil
- Be recorded within 24 hours on Behaviour Watch following their use
- If you have any cause for concern following restrictive practice with one of our pupils, please contact a Designated Safeguarding Lead.

## 18 Summary

1.61 The school is committed to safeguarding children and will always make safeguarding decisions that are in the best interests of each child. For further information or if you have any queries about this policy, please contact the school.

## 19 Appendix A

The school adheres to Coventry Safeguarding Children Partnership Policies, which can be found here; copies of school based policies can be found on the “Everyone” server drive, under “Policies”:

- [Allegations Against Staff or Volunteers \(CSCP\) LINK UPDATED](#)
- [Allegations Against Members of Staff](#)
- Anti – Bullying Policy
- Anti-Discrimination and Harassment Policy
- Attendance Policy
- Behaviour Policy
- Children/Young people with Medical Needs
- Children Missing in Education Procedures
- Complaints Policy
- Critical Incident Plan
- Data Protection Policy and Privacy Notice
- Equalities Policy
- [Managing Professional Disagreements \(CSCP\) LINK UPDATED](#)
- Health & Safety Policy
- HR & Governance Policy
- Online Safety Policy
- Intimate Care Policy
- IT Policy
- Lone Working Policy/Home visits policy
- Medicine & First Aid Policy
- Primary-Secondary Transition Policy
- PSHE Policy
- SRE Policy
- Safer Recruitment Policy
- SEND Policy
- Staff Code of Conduct
- Trips and Visits Policy
- Positive Handling Policy

- Whistleblowing Policy

## **20 Appendix B – Further Safeguarding Information**

### **Types of Abuse**

As outlined in paragraph 4.4, the school will take action if we believe a child is at risk of or is suffering from abuse. Abuse is not limited to physical, emotional, sexual abuse and neglect. For further information on the definitions of the types of abuse below, please refer to Keeping Children Safe in Education (2021), Annex A.

See below for policy information relating to other key safeguarding issues. All decisions taken in responding to concerns of abuse will be taken in the best interests of the child.

#### **Bullying, including cyber- or online-bullying**

The school takes all forms of bullying seriously and will respond sensitively and quickly to any reported bullying. Children should report any bullying to their class teacher, to the DSL or to any trusted member of staff and we will work to resolve it.

We also teach children about the dangers of bullying through our curriculum.

Bullying can take many forms and we have several policies that cover different aspects of bullying. Please see the Anti-Bullying Policy, the Behaviour Policy and paragraph 5.8 of this policy for further information.

#### **Child criminal exploitation (including involvement in county lines)**

Criminal exploitation (including involvement in county lines/ Child Sexual Exploitation)- Reports of Criminal exploitation would be dealt with through the schools normal safeguarding procedures. The DSL or DDSL would make a referral to both MASH and the Police as children may have been harmed or be at risk of immediate harm.

**Domestic abuse** – Include Operation Encompass School receives notifications weekly through the 'Operation Encompass alerts' Any reports from pupils who report domestic violence are recorded on CPOMS and followed up using the normal safeguarding procedures and protocols.

**Fabricated or induced illness** Patterns and reasons of absence are monitored by the DSLs using the school's attendance policy. Where high levels of absence are reported illness medical evidence is required. The school will also make a referral to the School Nursing team with parents' consent. Should consent be denied and concerns raise this would be recorded and monitored. Ultimately this would lead to a referral to MASH and parents

would be informed. School would seek to support the parents in the first instance through Early Help provision. The Pastoral Lead will undertake supportive home visits where necessary.

**Faith-based abuse** Staff are vigilant to changes in behaviour and /or appearance and will discuss with parents. All concerns should be registered with the DSLs immediately and then DSLs will follow protocol in ensuring referrals to MASH are made.

### **Female genital mutilation (A form of so-called 'honour-based' abuse)**

It is mandatory to report cases of FEMALE GENITAL MUTILATION to the police. Staff at Kingsbury Academy will receive annual training and updates in relation to FGM- reporting and recording. All concerns should be registered with the DSL's who will be available to support staff through the immediate referral process

### **Forced marriage (A form of so-called 'honour-based abuse')**

A marriage carried out without the agreement of both people. In the event of a disclosure from a child or parent this would be dealt with through the normal safeguarding procedures i.e. reported to the DSLs, recorded on CPOMS and a referral made to MASH. Use of interpreters will be provided, if needed, for the victim and as much information as possible would be gathered to pass on.

### **Gangs or youth violence**

Kingsbury Academy undertakes annual training of all staff on such issues. Staff are vigilant to any changes in behaviour or appearance and will share information with the DSLs, who will discuss with parents, if appropriate.

### **Gender-based violence**

Kingsbury Academy does not tolerate any form of bullying / violence etc. All concerns should be registered with the DSLs immediately. DSLs will follow protocol in ensuring pupils / staff are safe and concerns are reported to the appropriate people / agencies.

### **Hate**

Kingsbury Academy does not tolerate any form of bullying / violence / hate crime etc. All concerns should be registered with the DSLs immediately. DSLs will follow protocol in ensuring pupils / staff are safe and concerns are reported to the appropriate people / agencies.

### **Homelessness**

We recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Homelessness is a prevalent issue which affects many of our families. Using Early help provision in the first instance we support families with the process and meeting basic need through eg food bank vouchers, bus passes and clothing. Sign posting to agencies such as 'The Law centre', Citizens advice Bureau and the City Council for parents to seek further advice and support. Families work closely with our Pastoral Lead, Sayeda Ahkter.

**(So-called) 'Honour-based' abuse (For FGM and Forced Marriage, types of so-called 'honour-based' abuse, see above)**

In the event of a disclosure from a child or parent this would be dealt with through the normal safeguarding procedures ie Speaking to a DSL/ recording on CPOMS and a referral made to MASH.

**Radicalisation and Extremism –**

Kingsbury Academy understand that there is no such thing as a 'typical extremist' and that those who become involved are from varying backgrounds with varying experiences. Staff are trained in identifying indicators of vulnerability:

Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

\*Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement /reintegration;
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity.

Kingsbury Academy staff receive training around the signs and know to report any concerns to the DSLs. DSLs are aware of The Chanel Panel Process and will inform The Police and MASH of any concerns they have immediately.

### **Relationship abuse**

Kingsbury Academy does not tolerate any form of bullying / violence. All concerns should be registered with the DSLs immediately. DSLs will follow protocol in ensuring pupils / staff are safe and concerns are reported to the appropriate people / agencies.

### **Serious Violence**

#### **Sexual violence or sexual harassment (including peer-on-peer abuse)**

Kingsbury Academy understands that both adults and other children can perpetrate abuse, and peer on peer abuse is taken very seriously. Peer on peer abuse can include bullying, cyber-bullying, physical abuse, sexting, sexual violence and/or harassment and initiation/hazing ceremonies. The school recognise that safeguarding issues can manifest as peer on peer abuse. The school will ensure staff understand what is meant by peer on peer abuse and the school policy on peer on peer abuse by delivering staff training and updating staff through the use of staff meetings. The school will work to prevent peer on peer abuse by consistently delivering clear messages through the curriculum (SMSC, SRE and online safety), assemblies, behaviour policies and ethos and values work. Programmes within the curriculum will be age and stage appropriate and will include:

Healthy and respectful relationships

Keeping healthy and safe

What respectful behaviour looks like.

Body confidence and self-esteem.

Prejudice behaviour

Sexual violence and harassment is always wrong. This will enable children to understand, identify and report any instances of peer on peer abuse. Parent leaflets and regular safeguarding updates through the school newsletter / website will ensure parents are informed and provided with ways in which to report peer on peer abuse at Kingsbury Academy. The policy will also be made available online. In the event that an allegation of peer on peer abuse is made, Kingsbury Academy will investigate this immediately.

### **Sharing of consensual or non-consensual nude images and videos**

If staff have any concerns this must be reported to the DSLs immediately and recorded on CPOMS. To prevent this issue the school supports pupils through embedding online safety into the computing curriculum annually and through regular lessons. Parent workshops are also available.

### **Trafficking and modern slavery**

Our staff will be supported to recognise warning signs and symptoms in relation to each specific issue, and include such issues, in an age appropriate way, in their lesson plans.

DSLs have reference to the Home Office - Child Exploitation Disruption Toolkit. We would contact the police and MASH if we felt a child was at risk of immediate harm. If there is not a risk of immediate harm we would use the Modern Slavery helpline on 08000 121 700

### **Children missing from education, home or care**

The school will also take action to protect;

- Children missing education
- Children missing from home or care

### **Children Missing Education**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children Missing Education -  
\\_statutory\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

Please refer to the Attendance Policy and Missing Child Policy There is a statutory duty for parents and carers to ensure that their child attends school.

Kingsbury Academy monitors children whose attendance is less than 90%. Schools can delete pupils who fail to return within 10 school days of the agreed return date or after 20 days of unauthorised absence, if holiday/leave of absence has not been agreed. However, it is essential that

school checks that the pupils do not have a good reason for their delayed return, such as disrupted travel arrangements or illness, before deleting the pupil.

The school will make reasonable enquiries to locate the pupil before the deletion is made. If the decision is to delete the pupil from the register the school will write to parents informing them of this and a Children Missing Education referral will be made to the Children and Families First Service address.

It is the staff at Kingsbury Academy's responsibility to alert the DSLs, if a child or children are absent and no contact has been made with the family by 10am on the first absent day from school. The DSLs will then act accordingly.

All details and a chronology of emails and contact, will be kept on CPOMS

### **Children Missing from home or care**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/307867/Statutory\\_Guidance\\_-\\_Missing\\_from\\_care\\_\\_3\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care__3_.pdf)

### **Private Fostering**

The school have a duty to refer any children who are living in a private fostering arrangement to the local authority.

We will do this through a MASH referral. It is important that parents/carers inform us if a child is going to be staying at an alternative address to that of their primary care-givers for more than 28 days.

### **Indicators of abuse**

See below for possible indicators of abuse. (Taken from What to do if you are worried a child is being abused, 2015)

- Children whose behaviour changes – they may become aggressive, challenging,
- disruptive, withdrawn or clingy, or they might have difficulty sleeping or start
- wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends,
- without an obvious reason;
- Children who don't want to change clothes in front of others or participate in
- physical activities;



- Children who are having problems at school, for example, a sudden lack of
- concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with
- strangers;
- Children who reach developmental milestones, such as learning to speak or walk,
- late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late
- being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence
- of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

The school recognises that the above list of indicators is not exhaustive and staff will receive training on indicators of abuse.



## Appendix D

### Low-Level Concern - Appendix for Academy Safeguarding Policy

#### 1. Introduction

Across Thrive Education Partnership, the safeguarding of our children & young people is at the core of all we do; we do all we can to ensure that adults who work with our children & young people, do so in a way that is in accordance with the ethos and policies set out by our Trust and individual Academies, including the Staff Code of Conduct. This appendix sets out the detail and processes for any matters related to low-level concerns and how it is applied consistently across our Trust.

The following is taken from Keeping Children Safe in Education September 2021

407. "As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately"

408. "Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution"

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold set out within Academy Child Protection & Safeguarding Policies. If ever in doubt, then please do not hesitate to speak directly to the relevant person. We positively encourage any disclosure even if it may only feel like a 'nagging doubt'.

Concerns may arise in several different ways, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent, or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of our children & young people.

## 2. Definition of low-level concerns

It may be possible that a member of staff acts in a way that does not pose or cause a risk to children, but is however, deemed inappropriate. The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and;
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- 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

## 3. Reporting low-level concerns

We recognise and positively promote a culture of openness, trust, and transparency to encourage all staff to share any concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- Empowering staff to share any low-level concerns
  - Empowering staff to self-refer any situation which may cause concern. For example, where a situation may be misinterpreted, might appear compromising to others, or where they may have behaved in such a way that could be considered below the expected professional standards
  - Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
  - Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised
  - Helping to identify any weakness in the school's safeguarding system
- Reports of low-level concerns should be made by email, in writing or in person.

- A member of staff who has a concern about another member of staff should inform the Head Teacher

If the Head Teacher cannot be contacted, a deputy DSL should be informed instead.

- If the concern is about the Head Teacher, the Chair of Local Governing Body should be informed:

s.sherman@calthorpe.thrive.ac (Calthorpe Academy)

j.darch@kingsbury.thrive.ac (Kingsbury Academy & The Warwickshire Academy)

- If the concern is about a member of the Central Team (not including the CEO), then the CEO should be informed:

r.chapman@thrive.ac

If the concern is about the CEO, then the Chair of Trustees should be informed:

j.davey@thrive.ac (Chair of Thrive Education Partnership)

#### 4. Responding to low-level concerns

The relevant person will collect evidence where necessary by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously. If a complaint is raised anonymously, it will still be taken seriously but we will be reliant on the quality and detail of the provided written information: name of the individual, details of the concern and

any context such as dates and times, any other person involved and location.

- To the individual involved and any witnesses

The relevant person will use the information collected to categorise the type of behaviour and determine any further action, in line with the Academy/Trust Staff Code of Conduct or Disciplinary Policy.

## 5. Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

We will retain all records of low-level concerns (including those which are subsequently deemed by the Safeguarding Lead to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy).

These records will be kept confidential and held securely, with access afforded only to a limited number of individuals such as the Safeguarding Lead, and the individual they report to (e.g. headteacher/CEO); and senior HR officer.

The Head Teacher may store the central low-level concerns file with his/her other safeguarding and child protection records. The rationale for storing such records on a central file, rather than in staff members' personnel files, is that:

- it makes it easier to review the file and spot any potential patterns of concerning, problematic or inappropriate behaviour; and
- it reassures staff and encourages them to share low-level concerns.

## 6. Following Review

If following review, it is decided that the reported concern is sufficiently serious, then it will be referred to the LADO in line with the threshold intervention for the LADO, paragraph 338 KCSIE.

- when considered with any other low-level concerns that have been shared about the same individual, should it be reclassified as an allegation, then the allegation will be dealt with in accordance with Thrive Education Partnership Disciplinary Policy, Allegations Against Staff Policy, and Part 4 of KCSIE 2021.
- Some low-level concerns may also involve issues of misconduct, or they may trigger Thrive Education Partnership's Disciplinary, Grievance or Whistleblowing procedures.

- Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this will be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file.

- If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and a referral is made to them, then records relating to the low-level concern will be placed and retained on the staff member's personnel file.

- If a low-level concern (or group of concerns) is re-classified as an allegation, all previous records of low-level concerns relating to the same individual will be moved from the central low-level concerns file to the staff member's personnel file and retained in accordance with Part 4 of KCSIE 2021.

Records will be:

- Kept confidential, held securely, and comply with the DPA 2018
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual ceases employment at the Academy however, we will consider the following:

(a) whether some or all of the 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

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## 7. References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## 1. Changes

<b>Description</b>	<b>Date</b>	<b>Page</b>	<b>Section</b>
Addition of Low-Level concerns	Sept 21	30	13
Low Level Concerns Appendix C	15.12.2021	42	
Low Level Concerns Appendix D	15.12.2021	43	