Child Protection and Safeguarding Policy 2024

Ackworth Mill Dam

Contents

1. Policy Overview

Overarching Principles

At Waterton Academy Trust we recognise that academies and academy personnel are in a unique position in their care of children. The responsibility for all staff to safeguard pupils and promote their welfare, as stated in Section 175 of the Education Act (2002), is one that is central to our ethos, our policies, and our actions. All children are deserving of the highest levels of care and safeguarding, regardless of their individual characteristics or circumstances, and we are committed to applying this policy to ensure effective levels of safeguarding and care are afforded to all of our pupils. It is essential that all actions are taken first and foremost in the best interest of our pupils. This policy sets out guidance and procedures that all Waterton Academy Trust academies will follow to ensure appropriate action is taken in a timely manner to safeguard and promote the welfare of our pupils. Its contents are intended to be in accordance with all relevant Government guidelines and legislation, as well as the inter-agency procedures provided by our local authority safeguarding partners.

Intended Impact

- To enable all pupils to feel safe and cared for whilst attending a Waterton academy, and to ensure that they have a safe place and safe people to whom they can turn.
- To enable all adults involved with a Waterton academy to be fully equipped to fulfil their responsibilities in effectively promoting the safeguarding and welfare of every Waterton pupil.

Definitions

'Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education (2024) as: 'providing help and support to meet the needs of children as soon as problems emerge, protecting children from maltreatment whether that is within or outside the home, including online, preventing impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.' Working Together to Safeguarding Children (2023) also states that safeguarding includes 'promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children', as well as 'taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework'.

Roles and Responsibilities

- Pupils will: adhere to academy rules regarding conduct and safe behaviour; report anything that worries them to a trusted adult.
- Parents/carers will: work collaboratively with academy staff to promote the safety of their children and of other pupils; support our academy to teach pupils about keeping safe by reinforcing key safety messages; report any safeguarding concerns regarding their own children or another pupil to the academy.
- Each Waterton academy will: ensure that all pupils have a safe learning environment and are taught about how to keep safe; train and support all adults involved with our academy to appropriately identify and respond to any pupil at risk of harm; work collaboratively with parents and professional agencies to safeguard our pupils.
- The Academy Standards Committee (ASC) of each academy will: ensure this policy is applied robustly throughout the academy; review it regularly (annually at a minimum) to ensure the effectiveness and rigour of safeguarding practice.
- Waterton Academy Trust centrally employed staff will: know, understand and follow the safeguarding procedures for each academy within which they work; undertake relevant regular training and updates to ensure their skills and knowledge support them to meet their safeguarding responsibility.
- Waterton Academy Trust executive team members will: advise and challenge academies and their staff to support them in deploying best practice to meet their statutory safeguarding responsibilities.

How this relates to national guidance and statutory requirements

Statutory safeguarding and child protection practice for schools and academies is outlined in the following legislation and documents, with which this policy intends to be in accordance:

- Legal: Section 175, Education Act (2002); Section 26, Counter Terrorism and Security Act (2015); Human Rights Act (1998); Equality Act (2010)
- Government: Working Together to Safeguard Children (2023); What to do if you're worried a child is being abused (2015); Keeping children safe in education (2024); Children missing education (2016); Sexual violence and sexual harassment between children in schools (2021); The designated teacher for looked after and previously looked after children (2018); Information Sharing, Advice for practitioners providing safeguarding services (2018); Teaching online safety in schools (2019); Relationships education, relationships and sex education, and health education (2019); Sharing Nudes and Semi-Nudes (March 2024); Information Sharing (2024). This policy also meets requirements relating to safeguarding and welfare in the Statutory framework for the Early years foundation stage for group and school based providers (DfE 2024)
- Ofsted: Inspecting safeguarding in early years, education and skills settings (2021)

Other related policies

- Waterton Academy Trust Safeguarding and Child Protection Policy Statement
- Attendance Policy
- Behaviour Policy and Exclusion Policy
- Anti-Bullying Policy
- Code of Conduct Policy
- Disciplinary Policy
- Health and Safety Policy
- Online Safety Policy
- Intimate Care Policy
- Health and Safety Policy
- First Aid and Managing Medical Conditions
- Relationships, Health and Sex Education Policy
- Whistleblowing Policy
- Data Protection Policy

Equality statement

Some children have an increased risk of abuse and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
We give special consideration to children who:
- are disabled or have certain health conditions and have specific additional needs.
- have special educational needs (whether or not they have a statutory Education, Health and Care plan)
- have a mental health need.
- are a young carer.
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- are frequently missing/goes missing from education, home or care.
- have experienced multiple, are at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- are at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- are at risk of being radicalised or exploited.

- have a parent or carer in custody or is affected by parental offending.
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- are misusing alcohol and other drugs themselves.
- are at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- are a privately fostered child.

2. Policy in Detail

The role and responsibilities of the Designated Safeguarding Lead

- Each academy will appoint a senior member of staff from the leadership team to act as their Designated Safeguarding Lead (DSL) This person will coordinate all safeguarding and child protection procedures at the academy, including those related to online safety, filtering and monitoring, and will take lead responsibility for this area, which will be specified in their job description.
- Each academy will also appoint one or more Deputy Designated Safeguarding Leads, who will be trained to the same level as the Lead, will have their Deputy DSL role included in their job description, and to whom activities may be delegated.
- During school hours, the Designated Safeguarding Lead or their Deputy will be available to discuss any safeguarding concerns, either in person or, in exceptional circumstances, via phone or other modes of communication. The Designated Safeguarding Lead will make appropriate cover arrangements for any requirements or activities taking place out of school hours and during school holidays. In the event that the Designated Safeguarding Lead is absent, the Headteacher will arrange for suitable cover from the Deputy Designated Safeguarding Lead(s).
- The Designated Safeguarding Lead and their Deputy will undergo suitable training, including related to specific areas such as online safety and Prevent, to equip them with the skills and knowledge required to undertake their role, which will be updated at a minimum every two years; in addition, their skills and knowledge will be refreshed at regular intervals, annually at a minimum.
- The Designated Safeguarding Lead and their Deputy will ensure that all staff know and understand the safeguarding and child protection procedures at our academy, as well as knowing, and working effectively with, the local inter-agency procedures for assessment of early help needs and for referrals of suspected cases of abuse.
- The Designated Safeguarding Lead and their Deputy will encourage amongst staff a culture of listening to children and taking into account their wishes and feelings to help protect them. This includes understanding that children may not recognise that they are being abused, neglected of exploited, or feel ready to share this, and the importance of staff remaining professionally curious and seeking to build trusting relationships with children that facilitate communication. Pupil voice is valued in all our academies, and our academy staff will take every opportunity to hear from children, at an age-appropriate level, about their views and experiences, in order to inform our practice.
- The Designated Safeguarding Lead and their Deputy are expected to oversee and manage all referrals of suspected abuse that are made to Social Care, Police, Channel, and other agencies, and will also support and liaise with any academy staff who have either been involved in making such referrals or who have concerns about a pupil which may subsequently require a referral. All referrals will be followed up within one working day of them being submitted, if the academy has not received feedback from the agency to whom the referral was made.
- The Designated Safeguarding Lead will act as an Appropriate Adult where required, in line with Police Code, or designate an appropriate academy staff member to do so, under their explicit guidance and oversight. Any searching, screening or confiscation will take place in line with updated DfE guidance (2022).
- The Designated Safeguarding Lead and their Deputy will maintain detailed and secure records on our electronic system (CPOMS) of any concerns and referrals, and all subsequent follow up actions and communications. Record keeping on CPOMS will be in line with trust guidelines which are set out in the Use of CPOMs Policy (For more information on CPOMs see Appendix 1a). Records will be actioned and updated within one working day of the event taking place.
- For more information about the role of the DSL please see Keeping Children Safe in Education (2024) Annex C (p170)

Induction and training

- The Designated Safeguarding Lead and the headteacher will ensure that train all academy staff and volunteers are trained in line with local safeguarding partnership procedures to equip them with the necessary skills and knowledge to support them to fulfil their safeguarding responsibilities, including those related to online safety, filtering and monitoring. Key information will be shared on their first day before working with children, and induction in full will be completed no later than 1 month after employment commences.
- Training will be refreshed regularly, no less than annually, throughout the course of their work with each of our academies.
- Training and refresher sessions will reinforce understanding of the types of abuse, including specific safeguarding issues; the adult's role in recognising and responding to abuse; and the academy's processes for recording and following up on any concerns, including noting the rationale for decisions made to refer or not refer. Policies, policy updates, and statutory information will also be shared during induction and refresher sessions (see Section 3 – Implementation for more information).
- Additionally, the trust will train all members of the Academy Standards Committee (ASC) upon induction and as required thereafter to equip them with the necessary skills and knowledge to support them to fulfil their safeguarding responsibilities, including those related to online safety.
- Governor training, provided by the NGA, will reflect the unique strategic role of Governance and will reinforce understanding of each academy's role in safeguarding at an operational level, as well as guide Governors on their strategic approach to checking and verifying the effective and robust implementation of this policy.

Types of abuse and specific safeguarding issues

- Waterton Academy Trust recognise that adults working in our academies are in a unique position to recognise and respond to signs of abuse, and that these can take place and manifest in a variety of ways, including abuse that takes place online, and abuse that takes place between children.
- Induction training and regular refresher sessions will equip staff and volunteers to understand the different types of abuse, including specific safeguarding issues such as Female Genital Mutilation and radicalisation, and support them to know how to respond to any concerns.
- Appendix 2, details our approach to dealing with the risks posed by abuse, and how we identify and respond to any signs of abuse.

Contextual safeguarding

- Children are subject to possible risk at home, in the academy, in their local community and environment, and online, and we recognise that, in order to effectively safeguard our pupils and promote their welfare, we need to understand any specific issues arising in the local area that can affect the risk posed to them.
- We will work with local partners, including Social Care and Police, to ensure that we stay alert to any emerging contextual risks, and to ensure that assessment of risk for any of our pupils includes appropriate reference to their local community and environment.
- Further information to support staff in understanding contextual safeguarding can be found via the Contextual Safeguarding Network: https://www.contextualsafeguarding.org.uk/

Processes, procedures, and inter-agency liaison

- Each academy has a clear procedure for recording any possible signs of abuse, using a standardised safeguarding concerns form on the trust-wide online system (CPOMS). This will be explained to all staff and volunteers at induction. A paper copy of our concern is also available in the event of being unable to access the online system (see Appendix 1b). Training and refresher sessions will reinforce effective techniques for recording concerns and will highlight the importance of accurate written records, and the importance of recording the rationale for decisions made (in terms of the decision to refer or not refer).
- All new safeguarding concerns records, and any other documentation of a safeguarding nature (including any paper copies of concerns), are held in our online system, separately from any other pupil information, and are stored securely with access limited only to those who have received DSL training; namely, the Designated Safeguarding Lead, any Deputy Designated Safeguarding Leads, and the Headteacher. N.B. historic files, and those

received from previous settings, may exist in paper form, but these will be scanned and added to the child's electronic record.

- Pupil safeguarding files on the trust online system (CPOMS) will contain any relevant information and documentation related to the pupil's safety and welfare. Their contents will be logically organised and will allow for easy access to key events and information regarding the pupil. Should the pupil leave the academy, a copy of their safeguarding file will be transferred to the new school within 5 working days of the academy receiving explicit confirmation of the pupil having started at the new school via phone call or email. Confirmation of receipt of the file will be requested.

- Upon receiving a concern which indicates a suspicion of abuse, the Designated Safeguarding Lead or their Deputy will follow local inter-agency procedures, local information sharing protocols and statutory/legal expectations in deciding if a referral to an external agency is warranted. It is important to note that whilst a referral would typically be made by the Designated Safeguarding Lead or their Deputy, any member of staff can make a referral, and appropriate information will be signposted to all staff to support them to do so.

- In the case of a referral being made due to risk of significant harm, the referrer will make a detailed written record of their actions, including: dates and times of any conversations; the name and role of any professionals that were spoken to; the outcome of the referral; any actions that the referrer and the agency receiving the referral have agreed to.

- Any disagreements between the referrer and a professional or agency will be appropriately voiced and discussed, with the referrer following appropriate escalation procedures if they remain dissatisfied and if the circumstances warrant, in line with the Local Authority escalation procedures. Any disagreements or escalation will be recorded in writing by the referrer.

- The Designated Safeguarding Lead or their Deputy will be a proactive contributor to any strategy meeting, Child Protection conference/review, and core group, and will attend professionals' meetings where requested, providing appropriate written and/or verbal education and welfare reports related to the pupil and their family as requested by agencies and in line with statutory information sharing guidance.

- Records of all safeguarding work will be made on the pupil's safeguarding record. Any actions arising from a concern will be followed up and documented, and records of any communication with academy staff, external agencies and parents related to safeguarding will be documented on the pupil's record within 24 hours.

- Minutes and action plans of meetings will be retained on a pupil's safeguarding record, with relevant actions being fed back to the appropriate members of the team, and any progress towards meeting required actions and outcomes also recorded.

Early Help

- We recognise that early intervention when a child or family is starting to show signs of concern can be critical to ensure that the right help and support is sourced, preventing any further escalation of issues or a decline in the child's safety and wellbeing.

- We recognise that partnerships with parents and carers is crucial in identifying the need for early help and for effective collaboration to improve the life chances for pupils. Each of our academies work proactively with parents and carers to develop effective relationships between home and the academy, and to promote the benefits of early help and intervention to support their child, be that internally provided by our academy or externally provided by the Local Authority Early Help offer.

- Any child can benefit from early help, but our academies are particularly alert to the needs of: SEND pupils, including those with physical and/or mental health needs; young carers; pupils vulnerable to anti- social behaviour, gangs, abuse, exploitation and radicalisation; pupils currently in or recently returned from care or those being privately fostered; pupils misusing drugs or alcohol or living in households where drugs or alcohol are being misused; pupils living in households where they see, hear or experience domestic violence or parental mental health concerns; pupils who are persistently absent.

- In a case where a concern about a pupil does not suggest a risk of significant harm but they remain in need of additional support, the Designated Safeguarding Lead or their Deputy will liaise with parents and, with their permission, follow local Early Help Assessment guidelines in order to source the most appropriate support.

- The Designated Safeguarding Lead or their Deputy will be a proactive instigator and/or contributor to any Early Help Assessment and subsequent Team Around the Family meeting and, as above, will lead or attend professionals' meetings where requested, providing appropriate written and/or verbal education and welfare reports related to the pupil and their family as requested by agencies.

Mental health

- Waterton Academy Trust recognise that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect and, equally, that having experienced abuse or neglect can significantly impact on a child's mental health.
- In their role of seeing pupils' day to day, our staff are well placed to observe their behaviours and to identify any concerns relating to a pupil's mental health.
- Where a staff member has a concern about a pupil's mental health that also reflects a safeguarding concern, this will be reported and responded to in line with the guidelines above.
- The Designated Safeguarding Lead or their Deputy will work collaboratively with all relevant academy staff, i.e. SENCO, to contribute to any assessment of a pupil's mental health, and will work in collaboration with other agencies, as required, to best meet the pupil's needs and ensure their safety is considered as a primary focus.

Safer recruitment and the Single Central Record

- Waterton Academy Trust recognise that it is critical to ensure that our pupils are taught and supported by adults who are safe to do so, and that we are responsible for promoting a culture of safety within our academy environment by preventing unsafe adults from having access to it.
- In line with expected practice for safer recruitment, a minimum of one member of academy staff at each academy will undertake training in 'Safer Recruitment' and will be present on any interview panel. All safer-recruitment trained staff will read and be familiar with Part 3 of Keeping Children Safe in Education (2024) and our academy's Safer Recruitment policy.
- Each academy will maintain a Single Central Record, detailing the required and relevant recruitment and vetting checks undertaken on all academy employees, volunteers, Governors, agency workers and third-party staff.
- The Headteacher will oversee the SCR and be accountable for its accuracy, checking it regularly and termly as a minimum, making a record of the check and any subsequent actions that arise.
- The designated governor will also check the adherence of our safer recruitment practice to our academy's safer recruitment procedures on a regular basis, also making a record of the check and any subsequent actions that arise. N.B. Governors are not expected to have access to personal information as part of this process.
- The Single Central Record will be supported by files containing appropriate supporting evidence for recruitment and vetting checks, held in line with Data Protection legislation. Please see appendix 6. for further detail regarding our adherence to safer recruitment principles for adults in our academy.

Teaching pupils to stay safe

- Waterton Academy Trust recognise the importance of teaching our pupils how to stay safe, and that opportunities to do so form an integral part of a broad and balanced curriculum.
- Learning opportunities will take the form of: PSHE lessons (in line with statutory requirements for the Relationships and Heath curriculum and accompanying DfE-recommended resources), Computing lessons, Relationships and Sex education, assemblies, circle time, class time, and visiting speakers, as well as smaller group and focussed intervention for pupils identified as particularly vulnerable, as needed.
- The ethos of each academy and its curriculum will support the promotion of British Values, which is designed to build resilience to exploitation and radicalisation.
- Academy staff will model and teach safe behaviour and appropriate language (including how to stay safe online, and our use of filtering and monitoring) and will promote a culture of safety within each of our academies where everyone's opinion is valued, and everyone has someone safe to whom they can turn.
- It is important that pupils feel that we take seriously any concerns that they have. Our academies will actively collect feedback from pupils and will regularly engage with 'Pupil Voice' to seek the views of pupils on their experiences of feeling safe at our academy and within their communities.
- Please see the separate Relationships, Health and Sex Education policy and academy curriculum documentation for further information.

Use of premises for non-academy activities

- In the event that any of our Academy premises are used by organisations or individuals outside of the academy or Trust, it is essential that appropriate arrangements are in place to safeguard any children in attendance.
- The headteacher will seek assurance as part of any lease or hiring agreement that appropriate safeguarding arrangements are in place, in line with DfE guidance, Keeping Children Safe in Out Of School Settings (2022) This will be a condition of the lease, and failure to comply would lead to termination of the agreement.

3. Implementation

This policy applies to all adults involved with any of our academies, including paid staff, volunteers, including members of the Academy Standards Committee (local governors), and visitors. It will be publicly available on each academy website and will be available in paper form upon request from the office. Academies will also make available and/or signpost all relevant legislation, statutory and non-statutory safeguarding and child protection guidance, and relevant academy policies to staff and volunteers for their reference.

At the beginning of the academic year all academy staff and volunteers who work directly with pupils will be issued with a copy of this policy, along with a copy of the academy's Code of Conduct, whistleblowing policy, behaviour policy, anti-bullying policy, online safety, acceptable use & social media policy/ies, attendance policy and any additional information about responding to children missing in education (CME), together with Part 1 and Annex B of Keeping Children Safe in Education (2024). They will be required to sign a confirmation that they have received, read and understood these documents, and that they agree to abide by their contents. In addition, the Designated Safeguarding Lead will make accessible to all staff and volunteers who work directly with pupils all parts of Keeping Children Safe in Education (2024), and may direct them to read specific additional sections, dependent on their role.

Any new staff and volunteers who join a Waterton Academy subsequent to the annual policy issue, and who work directly with pupils, will receive a specific safeguarding induction, where the documentation listed in the previous paragraph will be shared with them. They will also be required to sign a confirmation that they have received, read and understood these documents, and that they agree to abide by their contents.

Any staff and volunteers working in our academies who do not work directly with pupils may be issued with a copy of Annex A of Keeping Children Safe in Education (2024), as an alternative to the above- named documents, in order to provide a better basis for these individuals to understand how to safeguard and promote the welfare of children. This decision will be made at the discretion of the Designated Safeguarding Lead. In addition, temporary and short-term visitors to our academy will be made aware of our safeguarding procedures.

The implementation of this policy will be reviewed on a regular basis by each academy Senior Leadership Team, and also by the Academy Standards Committee, led by the named academy Safeguarding Governor, to assess the effectiveness and impact of the academy's processes and procedures in safeguarding pupils and promoting their welfare.

Additionally, Waterton Academy Trust safeguarding team will support our academies in their implementation of this policy through the trust safeguarding strategy. This will include, amongst other areas, external audits, a DSL network, scrutiny of safeguarding pupil files, of actions taken by the Designated Safeguarding Lead or their Deputy in response to safeguarding concerns, and of the quality and impact of staff safeguarding training.

Failure by any staff member or volunteer to implement this policy could be considered an act of misconduct and will be dealt with in line with relevant academy policies. Any concerns about non-compliance with this policy should be raised as a concern about a member of staff, in line with Appendix 4a of this policy.

4. Complaints

The trust complaints and concerns policy can be followed where a parent/carers wishes to raise a concern about poor practice in relation to the implementation of this policy. The policy can be found on the trust website.

5. Confidentiality and information sharing

Timely information sharing is essential to effective safeguarding.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe (KCSIE Sept 2024 paragraph 119) except in circumstances where damage may be done to a person or group of people; 'this includes allowing practitioners to share information without consent...' (KCSIE 2024 paragraph 119). Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

The Academy follows the Seven Golden Rules for sharing information as outlined in the DfE publication 'Information Sharing' (May 2024). The golden rules are:

- **All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.** The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

- **When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child2and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.** You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

- **You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** You need a lawful basis3 to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm4, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

- **Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer5), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.

- **When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**

- **Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.** Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.

- **Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

Regardless of any duty of confidentiality, if any member of staff has reason to believe that a child may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the designated safeguarding lead (who in turn will refer immediately to the local authority children's social care) in accordance with this policy. All staff may raise concerns directly with children's social care services.

6. Policy Review

The Safeguarding and Child Protection Policy for academies will be reviewed by Trustees annually as per statutory requirements, or sooner, in the case of a mid-year update to statutory guidance in Keeping Children Safe in Education.

Any changes made to this policy will be communicated to all relevant stakeholders.

Appendix 1a – Record Keeping on CPOMS

CPOMS (Child Protection Online Monitoring Service) is a software application for monitoring child protection, safeguarding and other pupil welfare issues. CPOMS is used by all academies and settings in Waterton Academy Trust.

Every member of staff across the trust has an obligation to report any concerns that they may have. CPOMS allows us to record information in a central system and have relevant people alerted immediately. DSLs are able to build a chronology around a pupil and can produce reports for meetings, governors and Ofsted and fulfil any information requests from professionals/parents.

The use of CPOMs, and this Policy, will be reviewed and revised annually in light of our user experience.

For specific guidance for staff in using CPOMS, please see the trust Use of CPOMs Guide – issued in September 2023 and updated in 2024.

Pupil Safeguarding Cause for Concern Report Form
Paper copy – only to be use where CPOMs is not available.

This form can be used to share any concern with the DSL. This must be uploaded in its original format to CPOMS as soon as possible.

Details of CONCERN :

|	
Child's full name:	
Child's Date of Birth:	
Child's Class/Year Group:	
Date, Time and Location of incident/Concern:	
Witnesses (name/s):	

Description of incident/concern/observation:

- *WHAT you are recording: direct conversation, phone call, observation.*
- *MAIN CONTENT: the main and RELEVANT FACTS must be recorded i.e. what have you been told? What have you observed? If you are recording a conversation with a child, please record the words/phrases which they used.*

Body Map Completed:	**Yes / No**

*If the child has a physical injury, use the **body map** to note any marks or injuries, as well as a description of the mark i.e. colour, shape. If a child has an injury or mark, you can indicate where by marking it on the appropriate place on the body map. If you do this incorrectly, you can correct it. (But please initial where changes are made). The body map must be completed at time of observation.*

Staff Name:	
Job Title:	
Signature:	
Date:	
Time:	
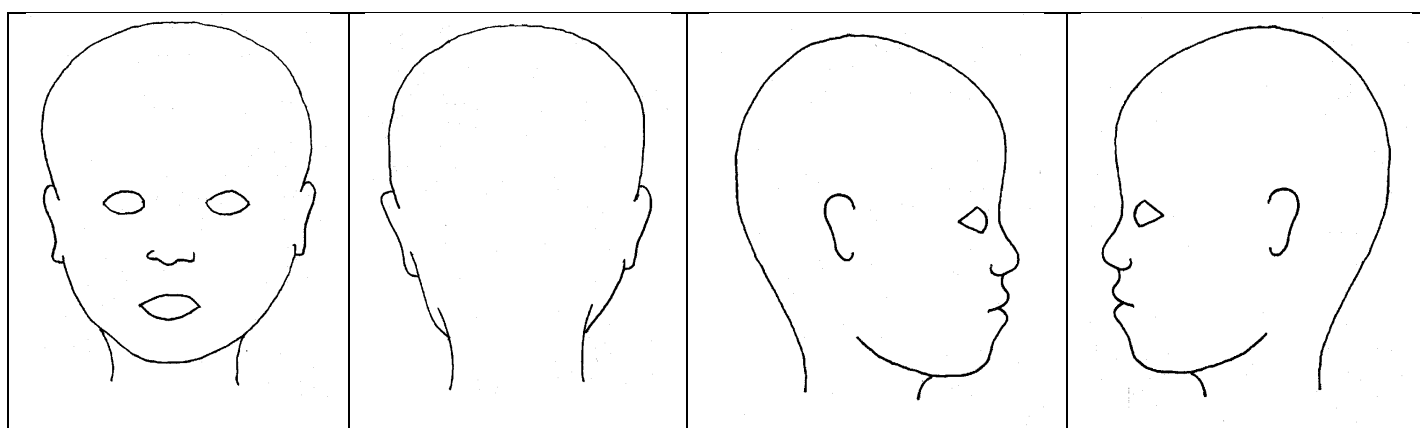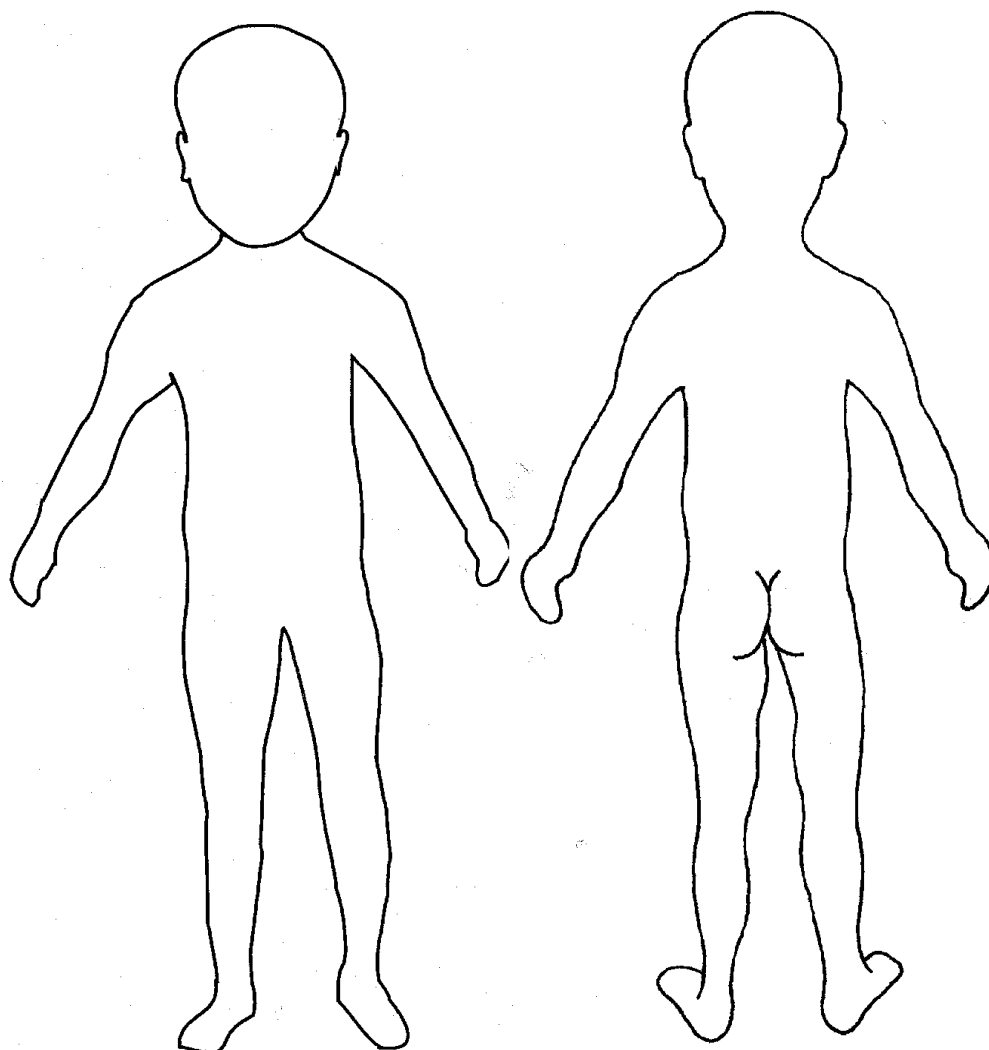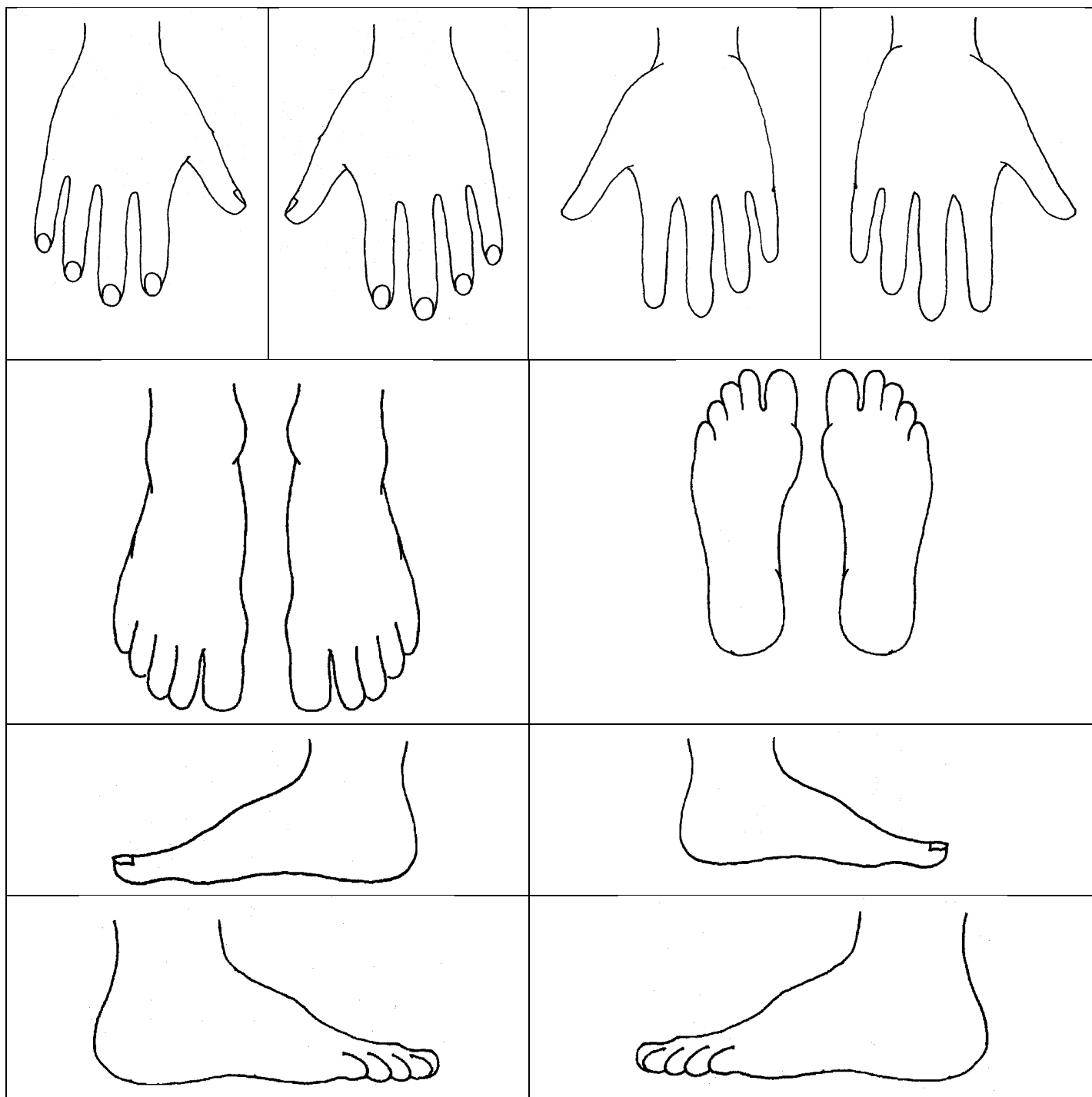
Appendix 2 – Types of abuse

We are aware that all children are potentially vulnerable to abuse. It can take place at home, in the academy environment, in the wider community and online; be committed by adults and by other children; be inflicted by people known to the child and by strangers; be a consequence of an act of deliberate harm and from failing to take necessary steps to prevent the child from coming to harm.

The four main types of abuse referred to in Keeping Children Safe in Education (2024), and a summary of their definitions, are:

- physical: 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: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development; may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person, not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate, age or developmentally inappropriate expectations being imposed, interactions that are beyond their developmental capability as well as overprotection and limitation of exploration and learning, or preventing them from participating in normal social interaction, seeing or hearing the ill-treatment of another, serious bullying (including cyberbullying), causing them frequently to feel frightened or in danger, or exploitation or corruption

- sexual: forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening; may involve physical contact, including penetrative or non-penetrative acts, non-physical contact, grooming a child in preparation for abuse, and online sexual abuse

- neglect: the persistent failure to meet a child's basic physical and/or psychological needs, or exploitation likely to result in the serious impairment of the child's health or development; may involve failure to provide adequate food, clothing and shelter, failure to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision, failure to ensure access to appropriate medical care or treatment, and failure to meet a child's basic emotional needs. In addition, if all avenues of support have been facilitated by schools, local authorities, and other partners, and the appropriate educational support or placements (e.g. an education, health and care plan) have been provided but severe absence for unauthorised reasons continues, it is likely to constitute neglect. Schools and local authorities should be especially conscious of any potential safeguarding issues in these cases and where these remain, conduct a full children's social care assessment.

High quality training, which is regularly updated, ensures all adults involved with our academy are familiar with the definitions of abuse, actions that constitute each of the four categories, and the signs of each type of abuse, including online, so that pupils who may be in need of help or protection are appropriately identified. Safeguarding training will be integrated and aligned with our academy-wide plan for training and curriculum.

In addition to the above, we recognise that there are a number of specific safeguarding issues that require special consideration due to their complex nature. All staff and volunteers working directly with pupils will be issued with a copy of Part 1 and Annex B of Keeping Children Safe in Education (2024), containing the full outline of specific safeguarding issues, and their accompanying guidance documents and resources, with which they are expected to be familiar.

Children potentially at greater risk of harm

- We recognise that children who have a Social Worker may have needed this due to abuse, neglect, and complex family circumstances, and that this potentially leaves them vulnerable to further harm. We also recognise that research shows that children who have a Social Worker, or have had a Social Worker, are at risk of lower educational outcomes than their peers.

- When we are alerted to a pupil in our academy having a Social Worker, the Designated Safeguarding Lead will inform other staff in the academy on a case-by-case basis in order to ensure the best interests of the pupil are being considered with regards to their safety, welfare and educational outcomes. This may include classroom staff, pastoral and support staff, and/or admin staff.

- The welfare and educational needs of our pupils with Social Workers, and those who have historically had a Social Worker, will be regularly reviewed by the Designated Safeguarding Lead to support teaching staff to provide additional academic support, as required, to promote their academic achievement. This will be discussed through Pupil Progress meetings, where actions or interventions are agreed, implemented and tracked. We will also work closely with the Virtual School Head and engage with any information and guidance arising from their strategic oversight of attendance, attainment and progress of all children with a Social Worker.

Child on child abuse

- Some children may abuse their peers, which can manifest in many ways, including bullying, prejudice-based and discriminatory behaviour, physical abuse, sexual abuse/harassment/violence, 'sexting', upskirting, and initiation/hazing. Child on child abuse of all types can take place inside and outside of our academy, and can be face to face or online.

- Harmful or abusive behaviour, including that which is of a sexualised nature, between pupils in our academy is not tolerated: we do not believe that it is to be expected, or to be accepted. We recognise that child on child abuse, particularly that which is sexual, is more likely to see boys as perpetrators and girls as victims; staff will be alert to this, but will ensure that all incidents of child on child abuse are taken equally seriously, regardless of the nature, identity or gender of the perpetrator and victim/s.

- With regards to child on child sexual abuse, we are aware of the outcomes of Ofsted's 2021 rapid review, and understand the importance of adopting an attitude of 'it is happening here' amongst our leaders and staff, regardless of whether there have been any specific reports from our pupils, in order to promote and embed a culture of constant awareness and vigilance. Part Five of Keeping Children Safe in Education (2024), Child On Child Sexual Violence and Sexual Harassment, will be made available for all staff, and they will receive training to recognise and respond to any incidents or reports of incidents.

- Any report of child on child abuse will be swiftly investigated, recorded and responded to in line with the academy's behaviour and anti-bullying policies, and, in the case of sexual abuse, in line with Part Five of Keeping Children Safe in Education (2024) The Brook Traffic Light Tool, in which a member of our DSL has received training, will be used to identify, understand and respond to the behaviour, and the language of the Tool, i.e. red/orange/green, will be reflected in the record keeping for each incident.

- Where appropriate, our response may include sanctions, separation or change of class, exclusion, referral to Early Help, Social Care and/or Police. Victim/s will be reassured, and both victim/s and perpetrator/s will receive appropriate support and guidance to safeguard and protect them and to ensure that their wellbeing is being promoted.

- We will use our curriculum to minimise the risk of child-on-child abuse taking place in our academy. This will help pupils understand, age-appropriately, what abuse is, and what the academy's policy and expectations are of their behaviour and conduct to each other, reassuring them that any concerns they have will be taken seriously and encouraging them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable or unsafe.

Gangs, youth violence, and serious violent crime

- We recognise that children are vulnerable, at any age, to being drawn into a gang environment and/or being targeted as perpetrators or victims of violence to others. Risk factors for such activity, including frequent absence from school and exclusion, will be considered in our application of our academy's attendance and behaviour policies.

- We understand the positive impact that education, and spotting and responding to early warning signs of gang behaviour and violence, can have on affecting a positive outcome for a child and for building resilience to gang culture.

- We will be vigilant to any signs of our pupils being drawn into, or affected by, gangs, youth violence, and serious violent crime, and will work with local agencies to safeguard any perpetrators and/or victims.

Exploitation, including child criminal exploitation (CCE) and child sexual exploitation (CSE)

- It is understood that any child of any age is vulnerable to the risks of exploitation, including child criminal and child sexual exploitation, and that this risk is not limited to older children or adolescents. Children can be exploited by

adults, but children can also be used to exploit other children. Exploitation can take place online as well as face to face. We recognise that both girls and boys can be exploited, both criminally and sexually, and that the experience of girls and boys, as well as the indicators of the risk they are facing, may differ.

- We are alert to the signs and indicators of a pupil becoming at risk of, or subject to, all forms of exploitation, including but not limited to: gang and violence-related activity; criminal and anti-social behaviour; going missing from education; underage and/or illegal sexual activity; risky behaviour, including behaviour online.
- In addition, we are alert to the signs and indicators of a pupil becoming at risk of, or subject to, exploitation for the purposes of county lines, a term used to describe exportation of illegal drugs by criminal networks between different locations in the UK. This includes but is not limited to: going missing from education; awareness, knowledge and use of alcohol and illegal substances.
- The Designated Safeguarding Lead is the academy's named professional for issues related to exploitation, and will work with local agencies as required to safeguard pupils at risk of, or subject to, exploitation.

Children with family members in prison, and children in the court system

- We recognise the significant impact that a parent being in prison can have on a child's outcomes, academically, emotionally and financially.
- We also recognise that children can be required to give evidence in court, either as victims or as witnesses, and that this is an experience likely to have a significant impact on them.
- Both of the above issues require bespoke support to ensure that the impact on the child's wellbeing is minimised. We will seek appropriate professional support for any of our pupils who are in these circumstances, and ensure that pastoral provision actively supports and monitors their progress.

Domestic abuse

- Seeing, hearing or experiencing domestic abuse, defined as controlling, coercive, threatening, violent and abusive behaviour between partners, ex-partners and family members, poses a serious risk to children, and we recognise the serious and long-lasting impact it can have on their health, wellbeing, development and ability to learn. Children experiencing domestic abuse are now recognised in law as victims.
- We will train our staff to know and understand the types of domestic abuse, including physical, emotional, psychological, sexual and financial, its risks, regardless of whether the child has been physically injured or not, and to recognise any incident of domestic abuse witnessed or experienced by our pupils as a potential safeguarding issue. Where necessary, we will work with local agency professionals to respond to any reported incidents of domestic abuse.

Homelessness

- We recognise that homelessness, and the risk of homelessness, places a child's welfare at significant risk, being at risk of poverty, exploitation, and becoming missing from education, amongst others.
- Timely intervention when a risk of homelessness is first identified is critical in preventing a situation from escalating and homelessness becoming a reality. We will work closely with families identified to be at risk, and with professional from relevant local agencies, to put appropriate measures into place to minimise the risk of homelessness.

'Honour based' abuse, including Female Genital Mutilation, Breast Ironing and Forced Marriage

- 'Honour based' abuse refers to actions committed under a belief of protecting or defending the honour of a family or community. Regardless of the motivation or circumstances, we recognise that these acts are illegal and abusive, and should be responded to as such.

- We are aware of, and will adhere to, the legal duty placed on teachers to notify the Police of any confirmed cases of Female Genital Mutilation carried out on a girl under the age of 18.
- We are alert to the signs and indicators of a pupil being at risk of 'honour based' abuse, and will work with local agencies as required to safeguard these pupils.

Radicalisation

- Under the Counter Terrorism and Security Act (2015) academies are required to have 'due regard to the need to prevent people from being drawn into terrorism', otherwise known as the 'Prevent duty'.
- We are alert to the signs and indicators of a pupil showing signs of radicalisation and of being at risk of being drawn into terrorism, and will work with local agencies and the Channel programme as required to safeguard these pupils.
- The Designated Safeguarding Lead is our named professional for radicalisation, who has an appropriate knowledge of the risks associated with the local area and is aware of the local referral processes for raising a Prevent concern. The DSL should undertake a Prevent risk assessment which is shared with all staff.
- We recognise that a broad and balanced curriculum will support pupils in developing resilience to extremist ideology; therefore, learning opportunities will promote pupils' spiritual, moral, cultural, mental and physical development, prepare them for the opportunities, responsibilities and experiences of life, promote community cohesion and British values, and provide a safe space in which they can understand, discuss and learn to challenge sensitive topics.

Children who are absent from education

- We recognise that regular attendance at schools is a protective factor for all pupils, and that absence from school can be a warning sign to a wide range of safeguarding issues. This is particularly the case for pupils where periods of absence are prolonged and/or repeated.
- Robust procedures are in place for monitoring and responding to pupil attendance, as outlined in our academy's Attendance policy, including, where possible, recording more than one emergency contact for each pupil.
- The Designated Safeguarding Lead will work closely with staff responsible for monitoring attendance to undertake regular, joint scrutiny of academy attendance monitoring systems to support early identification of children where absence is a cause for concern.
- We will work with local agencies where additional support and intervention is required to support improvements to a child's attendance, especially where periods of absence are prolonged and/or repeated.
- Please see our academy's Attendance policy for further information.

Children Missing Education

- We recognise that a child missing from education can be an indicator of abuse or neglect, including a risk of exploitation, 'honour based' abuse and radicalisation, as outlined above.
- In line with Children Missing Education (2016) and the local authority procedures, we will work with local agencies and make timely referrals as required to ensure that circumstances where children are missing from education are swiftly and appropriately responded to.

Elective Home Education

- We are alert to the possible risks posed to children if they are removed from school roll by their parents to be educated at home, especially if they are vulnerable, have a Social Worker or have SEND.
- We will work with parents and colleagues in our Local Authority and other relevant local agencies to ensure that due consideration has been given by all to what is in the best interests of the child, including in those circumstances

where a child being removed from school roll to be educated at home has an Education, Health and Care plan (EHCP)

- We will follow Local Authority procedures to notify of any child who is removed off school roll where a parent has indicated their decision to home educate.

Online safety

- Technology has become a significant risk factor in safeguarding children, and we recognise our responsibility to protect our pupils from the risks of inappropriate content and contact from inappropriate people, as well as educating them about how to conduct themselves safely online.
- We have robust systems for both filtering and monitoring online activity using our academy devices, which is aligned with the DfE's filtering and monitoring standards (March 2023)
- Staff are alert to the risks posed to pupils via their use of technology, typically referred to as 'the four Cs' (content: harmful or illegal content; contact: harmful online interaction with other users; conduct: personal online behaviour that causes harm or increases the risk of harm; commerce: risks such as online gambling or phishing) Staff receive appropriate training, including related to the academy's filtering and monitoring systems, to support them in ensuring that any online risks are swiftly identified and reported.
- The Designated Safeguarding Lead takes lead responsibility for coordinating our response to any risks linked to online safety, and has a full awareness and oversight of reporting of concerns from our filtering and monitoring systems. Any risks identified for our pupils arising from reports from either system will be responded to in line with this policy, and, additionally, our behaviour policy, as required, and, where needed, escalated to local agencies for additional support in line with local thresholds.
- Our Computing curriculum, together with assemblies and other learning opportunities, will equip our pupils with the necessary knowledge and skills to take best advantage of the many opportunities that technology brings whilst acting safely and responsibly whilst using technology. It will take into account all of the guidance contained within Government documents to ensure that pupils are sufficiently protected and educated with regards to online safety.
- Please see the Academy's Online Safety Policy/Acceptable Use Policy and Computing policies for further information, including agreements for the acceptable use of technology.

Children with Special Education Needs and Disabilities (SEND)

- We recognise that pupils with SEND, including those with physical and mental health conditions, face additional challenges in keeping safe, and that they may be subject to increased risk by virtue of their special need or disability. Their physical and emotional needs, behaviour, mood, difficulties with communication, and proneness to isolation and to bullying all make them more vulnerable to abuse, and more vulnerable to abuse being overlooked or ascribed to a different cause.
- Staff working with pupils with SEND who are non-verbal or have limited communication will be particularly vigilant of potential signs of abuse, such as changes in mood and behaviour, suspicious marks, etc, and will promptly respond to these signs by following the safeguarding procedures detailed above.
- We ensure that pupils with SEND receive appropriate pastoral provision, which, if necessary, may be additional to that provided to non-SEND pupils, and that they are taught in a way that is appropriate to their developmental stage about keeping safe and about sharing any worries or concerns with a trusted adult.
- Use of 'reasonable force', referring to use of physical contact to control or restrain a pupil, is sanctioned in schools when it is being used to safeguard. The additional vulnerabilities of pupils with SEND in the use of reasonable force is known and understood, and we are committed to reducing the risk posed to these pupils and limiting the need for use of reasonable force through our pastoral support and behaviour management systems.
- From time to time, pupils with SEND may need to receive additional support, or part-time/full-time education, from an Alternative Provision so that their needs can best be met. We will take responsibility for assuring ourselves

that the policies and procedures for keeping children safe at the Alternative Provision, including those relating to safeguarding and to safer recruitment, are sufficiently robust and are in line with statutory expectations. Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

- Please see the Academy's SEND/Inclusion and behaviour policies for further information.

Looked After Children, and previously Looked After Children

- Children are most commonly taken into care following abuse or neglect; consequently, pupils who are Looked After or previously Looked After, including those who have been adopted from care or are subject to care orders, can be vulnerable as a result of their historical experiences, as well as with their current care arrangements.
- We will appoint a Designated Teacher, who will be a qualified teacher, responsible for monitoring the progress and wellbeing of all Looked After Children, and for liaising with both academy staff and professionals from external agencies, including the Virtual School Head, to ensure appropriate provision to meet their academic, developmental and welfare needs. The Designated Teacher will also be responsible for monitoring the progress and wellbeing of all previously Looked After Children, ensuring that they have appropriate provision to meet their needs.
- The Designated Teacher will be responsible for ensuring that a Looked After Child's PEP is available, up to date and regularly reviewed to ensure it is having an impact on the pupil's attainment and wellbeing.
- The Designated Teacher will also be responsible for establishing effective partnerships with the child's carers.

Children who are lesbian, gay, bisexual or transgender (LGBT)

- We recognise that identifying as LGBT is not in itself a risk factor for harm; however, LGBT children, or children perceived to be LGBT, can be targets for bullying and abuse by their peers, the risks of which can be compounded if they do not have a trusted adult with whom to share these concerns.
- Staff will endeavour to provide a safe space for LGBT children to discuss concerns and remove any additional barriers that may prevent this.
- In line with our Relationships, Health and Sex education policy, pupils will be taught at an age-appropriate point about LGBT relationships.

Sharing Nudes and Semi Nudes

Staff responsibilities when responding to an incident: If any adult in school is made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately. The DSL will refer to DfE guidance: [Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024) - GOV.UK (www.gov.uk)](#)

They must **not**:

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

DSL Responsibilities: Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
- What further information is required, to decide on the best response.
- Whether the image(s) has been shared widely, and via what services and/or platforms, (this may be unknown).
- Whether immediate action should be taken to delete or remove images, or videos, from devices or online services.
- Any relevant facts about the pupils involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Appendix 3 – Contact Information

The following information should be displayed around the academy, and made available to visitors, parents and all staff in the academy.

	Full Name	Substantive Position	Contact Information
Designated Safeguarding Lead	Mr A Riby	Deputy headteacher	ariby@watertonacademytrust.org
Deputy Designated Safeguarding Leaders	Mrs S Annable Mrs W Burton	SENDCO Learning Mentor	Sannable@watertonacademytrust.org wburton@watertonacademytrust.org
Designated Teacher for LAC	Mrs S Thompson	Headteacher	s.thompson@watertonacademytrust.org

	Full Name	Contact Information
Chair of the board of trustees	Mr S Johnson	Email governance@watertonacademytrust.org
CEO of Waterton Academy Trust	Mr D Dickinson	Email admin@watertonacademytrust.org
Deputy CEO of Waterton Academy Trust	Mrs M Bretherton	Email mcbretherton@watertonacademytrust.org
Chair of the Academy Standards Committee	Mrs S Nunns	Email snunns@watertonacademytrust.org
Name of Safeguarding local governor	Mrs S Nunns	Email snunns@watertonacademytrust.org
Local Authority Social Care	0345 8503 503	social_care_direct_children@wakefield.gov.uk
Local Authority Out of Hours Social Care	0345 8503 503	
Local Authority LADO		lado.referrals@wakefield.gov.uk
Local Authority PREVENT agency		**Prevent in Wakefield - Wakefield Council**

Appendix 4a - Safeguarding concerns and allegations

Keeping Children Safe in Education (2024) defines an allegation of abuse against an adult in a school or academy as any case in which it is alleged that an adult (including employed staff, supply staff and volunteers) has:

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

This policy is designed to work in full accordance with the statutory guidelines set out within Part Four, Keeping Children Safe in Education (2024), as well as with local guidelines issued by (name) Local Authority, both of which describe the expected process for managing safeguarding concerns and allegations in detail. Headteachers, members of the Senior Leadership Team, Deputy Directors of Education and the Chair of Governors will familiarise themselves with both of these documents; however, key principles are summarised below.

Staff awareness

- All staff and volunteers (including members of the Academy Standards Committee) will be issued with our academy's Code of Conduct, and with this policy, which are intended not only to support them in adopting safe practice in their work with children but also to advise on how to report any concerns about the conduct of a colleague or any practice in our academy which they feel is unsafe for our pupils.
- Staff will also be issued with a copy of our whistleblowing policy; this refers more to concerns of a non-safeguarding nature, but its principles of everyone having a responsibility to report a concern support those of this policy.
- Additionally, all staff and volunteers are signposted to the Ofsted Whistleblower Helpline, 0300 123 3155, and to the NSPCC Whistleblowing Advice helpline, 0800 028 0285.
- Visitors to the academy, including contractor and agency staff, will also be provided with relevant information.

(a) Low level concerns about an adult in school – how to report

- We recognise that, at times, a concern about an adult's conduct towards pupils may not be serious enough to be considered as an allegation, but that it nonetheless indicates a concern.
- For the purposes of this policy, a **low level concern** is defined as a concern relating to behaviour that is inconsistent with our academy's Code of Conduct, but does not meet the threshold for an allegation of abuse, as outlined in Keeping Children Safe in Education (2024) and copied above.
- We understand the importance of creating a culture of openness and transparency, where any concern, no matter how small, is shared and dealt with appropriately. Such a culture supports us to identify and address any emerging or inappropriate behaviour at an early stage, minimising the risk of abuse and reinforcing clear professional boundaries.
- Our staff will be trained to recognise appropriate and potentially inappropriate adult conduct, in line with our academy's Code of Conduct, and they will be required to report any low level concern about the conduct of any adult working in our academy to the Headteacher. Exceptionally, in the Headteacher's absence, the report may be made to the next senior member of staff who is acting as the Headteacher in their place.
  - In the event that the concern is about the Headteacher, or the person acting as the Headteacher in the Headteacher's absence, this should be reported to the CEO.
  - If the low level concern is concerning a member of the Waterton Academy Trust central team, it must be made directly to the CEO.

- o   Where the low level concern relates to the CEO, it must be reported to the Chair of the Trust. Please see Appendix 3 for the contact details for these individuals.
- Staff will be encouraged to recognise any occasion where their own behaviour may be seen as a low level concern by others, and to make a self-report accordingly.
- Upon receipt of a low level concern, the Headteacher/CEO/Chair of the Trust will take timely and proportionate action to discuss and address this with the person concerned in order to correct the issue at an early stage. The Trust HR team is available to support with this process if required. If at any stage the Headteacher/CEO/Chair of the Trust assesses that there is a risk of harm to pupils, they will follow the process outlined below for reporting a safeguarding concern.
- The Headteacher/CEO/Chair of the Trust will keep records of all low level concerns using the report form below, in appendix 4b, detailing the nature of the concern and the action taken to address it. The record will be assessed and demarcated as a low level concern, in order to avoid confusion or misunderstanding. Records of low level concerns will **not** be referred to in employer references unless they form part of a substantiated allegation.
- The Headteacher/CEO/Chair of the Trust will regularly review all low level concerns received, in order to identify any emerging patterns of concerning behaviour related to individual(s) or to identify any weaknesses in academy culture where revision of policy or additional training may be a requirement.

(b) Safeguarding concerns about an adult in school – how to report

- If any adult working in our academy has a **safeguarding concern** about another adult or has concerns about another adult posing a risk to children, they should report these concerns. This duty is applied regardless of whether the person about whom there are concerns is an academy staff member, volunteer (including members of the Academy Standard Committee), a member of the Waterton Academy trust central staff member or external visitor, i.e. supply teacher.
- All reports of safeguarding concern about academy staff, an academy volunteer (including members of the Academy Standard Committee) or external visitor must be made directly to the Headteacher. Exceptionally, in the Headteacher's absence, the report may be made to the next senior member of staff who is acting as the Headteacher in their place.
  - o   In the event that the concern is about the Headteacher, or the person acting as the Headteacher in the Headteacher's absence, this should be reported to the CEO.
  - o   If the concern is concerning a member of the Waterton Academy Trust central team, it must be made directly to the CEO.
  - o   Where the low level concern relates to the CEO, it must be reported to the Chair of the Trust. Please see Appendix 3 for the contact details for these individuals.
- If the report of a safeguarding concern is made verbally, it must be followed up in writing by the person reporting the concern using the form below in appendix 4b, as directed by the person to whom the concern has been reported.
- On occasion, we may receive safeguarding concerns from individuals outside of our academy. In this instance, the person to whom the report is made must share the concern in line with processes outlined above. Safeguarding concerns received from external sources will be responded to in the same way as a concern being received from inside the academy.

LADO Referral process

- The Headteacher, members of SLT (in case of the Headteacher's absence), CEO, and Chair of Trustees (in case of an allegation being against the CEO), will know the name and contact details for the Local Authority Designated Officer (LADO), with whom contact will be made as soon as possible upon receipt of an allegation against a member of staff or volunteer at our academy, and always within one working day. No investigations will be carried before advice has been sought from the LADO.

- If further investigation or action is required, the person referring the concern to the LADO will then be nominated as the 'case manager'. If the specific circumstances warrant, or if the case is unusually complex, the case manager role may be taken on by a professional independent to our academy, i.e. a senior colleague from within Waterton Academy Trust.
- In the event of a safeguarding concern being raised about an adult not directly employed by the academy, i.e. a supply teacher, the same process will be followed to contact the LADO. Additionally, the Headteacher will liaise with the individual's employer subsequent to the referral to ensure full cooperation and involvement with any process required to investigate and resolve the concern that has been raised.
- In the event of any referral to LADO being made, the referrer will immediately inform the Deputy CEO who will support with the subsequent process. If the referral relates to the Headteacher, the CEO will be immediately informed.

Information sharing

- When directed to by the LADO, the case manager will inform the accused person of the allegation and will give as much information as possible about its nature. We have a duty of care to our employee/volunteer, and will provide effective support to anyone in this situation, as well as ensuring that the matter is dealt with quickly, fairly and consistently.
- As directed by the LADO, the case manager will also tell the parents of the child or children involved of the allegation (if they are not already aware) and will keep them informed as to the progress and outcome of the process.

Managing an allegation

- As directed by the LADO, and in consultation with the Waterton HR team and the CEO and Deputy CEO, we will assess the possible risk posed by the accused individual if they are to continue in their role. This assessment may result in suspension if the risk is considered sufficient and if all suitable alternative options have been considered.
- If a member of staff or volunteer who is judged to be unsuitable to work with children resigns or their services cease to be used, we will assess the situation against the published DBS criteria, and, in the case of teachers, Teaching Regulation Agency criteria, and will follow up with a referral to either or both regulatory bodies where necessary. A compromise or settlement agreement will not be used in cases where this would prevent a referral to DBS being made, as to do so could result in a criminal offence and is non-compliant with our legal duty.
- One-off and/or repeated allegations of malicious, false, unfounded or unsubstantiated conduct will not be referred to in employer references.
- Where an allegation has been found to be malicious, we will consider whether to take further action, either via the Behaviour policy (in the case of a pupil) or via discussion with the Police (in the case of a parent or other adult)

Record keeping

- Full details of each stage of the allegations process will be recorded in writing by the Case Manager.
- Where an allegation has been found to be malicious, i.e. the allegation is disproved and there has been a deliberate attempt to deceive, all details and records will be removed from the person's personnel file.
- For allegations found to be substantiated, false, unfounded or unsubstantiated, details of the allegation and the investigation process, including the outcome, will be kept as per the Disciplinary policy, but usually separately and confidentially to the person's personnel file, with a copy also provided to the person concerned.
- Records will be retained for a period of 10 years from the date of the allegation, or until the accused has reached pension age (if this is sooner)

Learning lessons

- As soon as is practicable, all involved parties will convene to review the facts of the case, reflect on any lessons to be learned, and implement any needed changes to policy and/or procedure. Where applicable, this will include reference to any feedback given by the LADO.

Adult Concern Report Form
Low Level and Safeguarding Concerns

This form can be used to share any concern with the DSL/Headteacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

Details of CONCERN :

Name of Staff member :

Role:

Signed :

Time and Date :

Received by (name):	Role:
At [time] :	Date :
Signed:	

Initial Assessment (please tick)
• **Low level** concern ☐

If yes, please follow steps set out in the Child Protection and Safeguarding Policy in Appendix 4a with regards to low level concerns • **Safeguarding** concern ☐ If yes, please follow steps set out in the Child Protection and Safeguarding Policy in Appendix 4a to Safeguarding concerns	

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].

NO ☐ - Give a brief but valid reason/explanation for not;

YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

ACTION TAKEN :

Was advice/guidance sought from the LADO and or Human Resources? Yes : ☐   No : ☐

Signed :	Dated :

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

Appendix 5 – Local agency procedures and Links

(Insert local agency safeguarding/early help referral procedure here; any charts, flowcharts, threshold guidance, etc, can also be pasted here)

Name	Description	Website / Contact Details
West Yorkshire Consortium Procedures	West Yorkshire Consortium Inter Agency Safeguarding and Child Protection Procedures.	https://westyorkscb.proceduresonline.com/index.htm
WSCP Wakefield Safeguarding Children Partnership	Wakefield Safeguarding Children Partnership (WSCP) supports local organisations who work or volunteer with children and families to work together to safeguard children and promote their welfare.	https://www.wakefieldscp.org.uk
Children Missing Education - Wakefield Council	Guidance for Schools, Providers and Professionals from Wakefield Council	https://www.wakefield.gov.uk/media/noebgkw5/children-missing-education-guidance-for-schools.pdf
Operation Encompass	Operation Encompass is a police and education early information safeguarding partnership enabling schools to offer immediate support to children experiencing domestic abuse.	https://www.operationencompass.org
Wakefield WF-I-Can	Online resource for children and young people in Wakefield	https://wf-i-can.co.uk

Name	Description	Website / Contact Details
NSPCC (National Society for the Prevention of Cruelty to Children)	The NSPCC is a leading charity dedicated to preventing child abuse and providing support for children and families. They offer resources, helplines, and training for professionals and parents on safeguarding issues.	https://www.nspcc.org.uk/
Child Exploitation and Online Protection (CEOP) Centre	CEOP is a part of the National Crime Agency and focuses on combating the sexual exploitation of children online. The website provides resources for children, parents, and professionals on online safety.	https://www.ceop.police.uk/
Educate Against Hate	This government-supported website provides resources and guidance to help parents, teachers, and school leaders tackle extremism and radicalization.	https://educateagainsthate.com/
UK Safer Internet Centre	This centre provides resources and advice to promote the safe and responsible use of technology among children and young people.	https://www.saferinternet.org.uk/
Kidscape	Kidscape focuses on preventing bullying and child abuse. They offer training, advice, and	https://www.kidscape.org.uk/

	resources for parents, professionals, and children.	
The Hazelhurst Centre	The Hazelhurst Centre offer free, confidential healthcare and compassionate support to anyone in West Yorkshire that has experienced sexual assault or rape in their lifetime.	https://hazlehurstcentre.org Tel: 0330 2233617
Respect Phoneline	This helpline provides support and information to those concerned about domestic abuse or violence. It also offers guidance to perpetrators who want to change their behaviour.	https://respectphoneline.org.uk/
YoungMinds	YoungMinds is a charity focused on children and young people's mental health. Their website provides resources and advice for parents and professionals.	https://youngminds.org.uk/
The Anna Freud National Centre for Children and Families	This organization focuses on children and young people's mental health and offers resources, training, and research-based insights for parents and professionals.	https://www.annafreud.org/
Wakefield Council - Suicide	Supporting a child or young person with stress, depression or suicidal thoughts - Wakefield Council	https://www.wakefield.gov.uk/health-and-advice/mental-health-and-wellbeing/childrens-mental-health/supporting-a-child-or-young-person-with-stress-depression-or-suicidal-thoughts/
Wakefield Council	Wakefield Resilience framework to build resilience in our students.	https://www.riskandresilience.org.uk
PAPYRUS	PAPYRUS is the national charity dedicated to the prevention of young suicide.	https://www.papyrus-uk.org https://papyrus-uk.org/wp-content/uploads/2018/10/400734-Schools-guide-PAPYRUS.pdf Tel: 0800 0684141 Text: 07860 039967

Appendix 6 – Academy safer recruitment procedures

Recruitment, selection and pre-employment vetting is carried out in accordance with Keeping Children Safe in Education (2024) including:

- At least one person on every interview panel will have undertaken Safer Recruitment training.
- Any family or close friend relationship must be declared as soon as they become apparent. No employee will be the selection panel for the recruitment of a family member or close friend.
- Clear and detailed job descriptions will be created, outlining roles, responsibilities, and required qualifications for each position.
- Advertisements will include the following statement: "We are committed to safeguarding and promoting the welfare of children and young people and require all staff and volunteers to share and demonstrate this commitment. The successful candidate will have to meet the requirements of the person specification and will be subject to the relevant pre-employment checks which will, where applicable, include a health check, an enhanced DBS check, the Children's Barred List check and satisfactory references and a basic online search."
- CV's will not be accepted as part of the application process.
- All gaps in employment will be explored with candidates during the interview process.
- References will be sought before interview so any concerns can be explored with the applicant at interview along with any gaps or inconsistencies from their application form. References will be validated with a phone call to the source.
- All offers of employment will be conditional upon satisfactory completion of the pre-employment checks applicable for the role.
- Pre-employment checks are undertaken in line with Keeping Children Safe in Education. All staff, including volunteers, should undergo Disclosure and Barring Service (DBS) checks to assess their criminal record and suitability to work with children.
- The Trust has considered whether or not to include online searches of publicly available information as part of the pre-employment check, and has opted not to do so in order to respect privacy, avoid potential bias, and ensure that all recruitment processes focus on relevant professional qualifications and experience.
- Online searches of publicly available information will be carried out as part of the pre-employment check.
- The Single Central Record is maintained in accordance with Keeping Children Safe in Education.
- Agency/Supply staff: We will obtain written confirmation from supply agencies that agency and third party staff have been appropriately checked and trained and ensure the correct person arrives in school.
- To comply with the DBS code of practice and Under GDPR we will not keep the original or copies of DBS certificates.

Visitors in school

Visitors and parents are not allowed into school buildings without a visitor's badge and will be accompanied by a member of staff whilst inside the building(s). Visitors wishing to enter a school building must sign in on arrival and sign out again on departure. Un-badged and unaccompanied visitors inside buildings will be challenged by a member of staff and escorted to the office to complete the signing-in procedures. Those visiting the school site to collect or drop off children or to watch matches or concerts are restricted to appropriate areas and will be directed as to which locations are available to them.

Schools will check the identity of all new agency staff on arrival (by requesting photo id) and ensure the person presenting themselves for work is the same person that the agency has provided vetting checks for. All visitors will be issued with a leaflet informing them of who the DSL's are, the code of conduct expected and what to do if they have a safeguarding concern.

Document Detail	
Document Name	Child Protection and Safeguarding Policy
Version	2
Chief Officer Signature:	D Dickinson, CEO
Effective from:	September 2024
Approved by:	Trust Board
Approval meeting reference:	November 2024
Next Review Date:	November 2025

Version Control			
Version	Date	Author	Change /Reference
1	July 2023	Marie-Claire Bretherton	New policy created based on KCSIE and cross-referenced to any local templates provided by the local authority
2	Sept 2024	Marie-Claire Bretherton	- Reference to KCSIE 2023 removed and 2024 added. - Updated to match Working Together to Safeguarding Children 2023 - P3. Updated definition of safeguarding to match KCSIE 2024 adding (a) "providing help and support to meet the needs of children as soon as problems emerge, and protecting children from maltreatment (b) whether that is within or outside the home, including online" - P4. Addition of reference to Sharing Nudes and Semi-Nudes (March 2024); and Information Sharing (2024). And 'This policy also meets requirements relating to safeguarding and welfare in the Statutory framework for the Early years foundation stage for group and school based providers (DfE 2024)' - P4. Updated list in the equality section, with reference to children who we give special consideration to. - P5. Addition of "including noting the rationale for decisions made to refer or not refer" - P5. Addition of '" abused, neglected of exploited"

			- P6. Addition of "the importance of recording the rationale for decisions made (in terms of the decision to refer or not refer). - P7. Addition of "see, hear or experience" in relation to domestic violence - P10. Addition of seven golden rules for information sharing, based on DfE guidance 2024. - P15. Addition of the word 'exploitation' - P18. Addition of 'The DSL should undertake a Prevent risk assessment which is shared with all staff.' - P20. Addition of 'Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.' - P20-21 Addition of a new section on 'Sharing Nudes and Semi Nudes'.