EMMAUS
CATHOLIC ACADEMY TRUST

DIOCESE OF SALFORD

Safeguarding and Child Protection Policy

September 2025

Humility • Faithfulness • Service

POLICY DOCUMENT	Safeguarding and Child Protection Policy
Legislation/Category: Academy Schools	LEGALLY REQUIRED
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EMMAUS CATHOLIC ACADEMY TRUST

The Diocese of Salford provides Catholic Academy Trusts, schools, and colleges for the following reasons:

1. **To assist in the mission of making Christ known to all people;**
2. **To assist parents and carers, who are the prime educators of their children, in the education and religious formation of their children;**
3. **To be of service to the local Church – the Diocese – the Parish and the Christian home;**
4. **To be of service to society.**

Emmaus Catholic Academy Trust Vision:

To provide great Catholic education across Greater Manchester.

Journey with Emmaus CAT…

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1. Policy Statement

Our core purpose is to create a healthy Catholic organisation serving the pupils in our Catholic schools, communities, families, and parishes across Greater Manchester. We are aligned in our mission to work collegially to ensure that we have great schools, strong in faith, serving society. Schools where every pupil has an equal opportunity to thrive and receive the very best Catholic education and formation. Our guiding principles and this Child Protection and Safeguarding Policy exist to ensure that each Emmaus CAT school has a clear and compelling vision for all of its pupils, focused on creating an inclusive environment, tailored to the needs and abilities of each and every pupil. At Emmaus CAT we will succeed with our philosophy of aligned autonomy, the belief that talent is key and the sharing of curriculum knowledge and academic rigor.

2. Aim of Emmaus CAT Policies

The aim of this, and all Emmaus CAT policies is to support the seven major themes of Catholic Social Teaching, which include;

- The dignity of work and the rights of the worker;
- Solidarity with all people;
- A preferential option for the poor;
- Stewardship and care for creation;
- The call to community and participation;
- The sacredness of life and the dignity of the human person;
- Human rights and the responsibility to protect them;

as well as ensuring that national legislation and guidance are implemented across all our schools. Our policies should not be viewed in isolation, but along with our guiding principles, as integral to all aspects of school improvement. With our policies we aim to create an effective partnership with parents and carers, the prime educators of their children, to ensure that all children reach their potential whist setting high expectations and aspirations, in a positive and supportive environment. All Emmaus CAT policies will clearly define and communicate the core principles which underpin our Catholic culture, mission and vision.

3. Good Safeguarding Practice

The following key features will help schools promote and maintain a safer culture that protects and promotes the welfare of children, young people and vulnerable adults. These features are:

- A leadership commitment, at all levels, to the importance of safeguarding and promoting the welfare of children, young people and vulnerable adults.
- A clear line of accountability for all safeguarding work with clarity of roles and responsibilities.
- Clear reporting procedures to deal with safeguarding concerns and allegations.
- Practice and services informed by ongoing learning, review, and by the active involvement of student voice and parent participation.
- Safer recruitment procedures in place.
- Clear arrangements for support and professional supervision.
- Comprehensive safeguarding training for all staff and volunteers working with or in contact with children, young people and their families.

- Effective working with statutory and voluntary sector partners
- Complaints and whistleblowing procedures that are well publicised.
- Effective information sharing.
- Good record keeping.
- Regular training and/or updates.
- Induction of new staff.

4. Policy Commitments

Emmaus CAT commits to:

Promoting a safer environment and culture
All staff and volunteers respect our children and promote their well-being. We will strive to create and maintain environments that are safer for all, that promote well-being, that prevent abuse, and that create nurturing, caring conditions within our schools for all. We will work to continue to strengthen and review these environments. This will be done by training, support, communication, learning, governance and quality assurance processes. Emmaus CAT will strive to support all school leaders to adhere to safer working good practice and to challenge the abuse of power. It will ensure that processes are in place that listen to and advocate on behalf of children and their families within the knowledge that they will be cared for safely.

Safely recruiting and supporting all those with any responsibility related to children within our schools.
The CAT, school leaders and governing bodies will select and vet all those with any responsibility related to children, young people and vulnerable adults, in accordance with the safeguarding policy and practice guidance. We will train and equip all staff and volunteers to have the confidence and skills they need to care and support children and their families and to recognise and respond to abuse. This will be done by supporting the roll-out of consistent and accessible safeguarding training in accordance with KCSiE 2025 requirements.

Responding promptly to every safeguarding concern or allegation.

Anyone who brings any safeguarding suspicion, concern, knowledge or allegation of current or non-current abuse to our notice will be responded to respectfully and in a timely manner, in line with statutory child and adult safeguarding procedures and Emmaus CAT policies. All safeguarding work will be recorded in line with KCSiE requirements. All suspicions, concerns, knowledge or allegations that reach the threshold for reporting to the statutory authorities, will be reported via the DSL to the appropriate statutory agency. This will be done irrespective of the status of the person. All staff and volunteers will cooperate with the statutory authorities in all cases. In responding to concerns or allegations of abuse relating to any adult within our schools, we will act in accordance with the requirements of criminal, civil and ecclesiastical law, and so will respect the rights and uphold the safeguards afforded in these, both to the person alleging harm and the subject of concerns or allegations

Caring pastorally for victims/survivors of abuse and other affected persons
Emmaus CAT will endeavour to offer care and support resources to all those that have been abused, regardless of the type of abuse, when or where it occurred. We are committed to continuing to learn how to respond in a supportive and healing way to the needs of those who have suffered abuse. Those who have experienced harm will receive a compassionate response, be listened to and be taken seriously. Emmaus CAT leaders will respond to any disclosure of abuse in accordance with statutory

legislation and Emmaus CAT policy and practice guidance. This will be done in collaboration with the relevant statutory agencies in accordance with criminal, civil and ecclesiastical law. They will be offered appropriate pastoral care, counselling and support - according to the agreed need. An appropriate pastoral response will be considered, with due regard to the right of privacy of those directly involved, and to the administration of justice.

Caring pastorally for those who are the subject of concerns or allegations of abuse and other affected persons

Emmaus CAT leaders, in exercising their responsibilities to suspicions, concerns, knowledge or allegations of abuse will endeavour to respect the rights under criminal and civil law. A legal presumption of innocence will be maintained during the processes. As the process progresses additional assessment, therapy and support services may be offered in consultation with relevant external agencies. Emmaus CAT leaders will take responsibility for ensuring that steps are taken to protect others when any adult is considered a risk to children. Emmaus CAT will remain alert to the need to provide wider support to those affected.

5. Acronyms

Acronym	Long Form	Description
CCE	Child Criminal exploitation	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence
CME	Child Missing from Education	Where the school does not know the whereabouts of a child who is missing from school
CPOMS	Child Protection Online Management System	An electronic platform used by schools to report safeguarding concerns or observations in line with the school's child protection policy
CSC	Children's Social Care	The branch of the Local Authority that deals with children's social care
CSE	Child Sexual Exploitation	Where in an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any sexual activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence
DBS	Disclosure and Barring Service	The service that performs statutory check of criminal records for people who wish to work with children and vulnerable adults either through paid employment or a voluntary basis
DfE	Department for Education	The national government department with the responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England
DPO	Data Protection Officer	The appointed person in a school or trust with the responsibility for overseeing the responsible use of data

		within the organisation and ensure data is handled in line with the Data Protection Act
DSL	Designated Safeguarding Lead	The member of the senior leadership team who is responsible for the strategic leadership and quality assurance of safeguarding across a school or trust
DDSL	Deputy Designated Safeguarding Lead	The designated safeguarding lead deputy who is trained to the same standard and can make decisions regarding child protection cases within a school
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland
EHCP	Educational Health and Care Plan	A funded intervention plan which coordinates the educational, health and social needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support
EHA	Early Help Assessment	An Early Help Assessment is a tool that helps to identify and address the needs of children and their families. It involves a lead practitioner who works with the child and their parent or carer, with their consent to gather and analyse information about their situation. The assessment leads to a family plan that outlines the goals and actions to improve the outcomes for the child and family
ESFA	Education and Skills Funding Agency	Department for Education with accountability for funding education and skills training for children, young people and adults
FGM	Female Genital Mutilation	A procedure where the female genital organs are injured or changed. There is no medical reason for doing this
UK GDPR	UK General Data Protection Regulations	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent
HBA	Honour Based Abuse	So-called "honour-based" abuse or violence encompasses incidents or crimes that have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing
HMCTS	HM Courts and Tribunal Service	HMCTS is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive, sponsored by the Ministry of Justice
IICSA	Independent Inquiry into Child Sexual Abuse	The IICSA is analysing case files from the DBS to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand the institutional responses to these behaviours
ITT	Initial Teacher Training	A programme of training within schools to achieve qualified teacher status
KCSiE	Keeping Children Safe in Education	Statutory guidance setting out schools and colleges' responsibilities to safeguard and promote the welfare of

		children. This policy refers to KCSiE 2024 (the most recent guidance). Any policy update will be duly amended and referenced. Throughout this policy KCSiE 2024 is referred to as KCSiE
LA	Local Authority	A local government agency responsible for the provision of a range of local services including education
CLA/LAC	Children in the care of the local authority/Looked After Children	Children who are in the care of the local authority, either in residential care or a foster placement for a period of longer than 24 hours
LADO	Local Authority Designated Officer	A LADO is the designated person employed by the LA to respond to allegations of abuse against adults who work with children. Every LA must have a LADO in place who is responsible for co-ordinating the response to the allegation. The LADO works with the employer, the police, and other agencies to ensure a fair and thorough investigation
LGBTQ+	Lesbian Gay Bisexual Transgender and Queer	Term relating to a community of people who share protected characteristics covered by the Equalities Act
MAT	Multi-Academy Trust	An educational trust set up to provide support and collaboration across a number of schools
NRM	National Referral Mechanism	The NRM is a framework for identifying and referring potential victims of modern slavery and to ensure they receive the appropriate support
NPCC	National Police Chiefs' Council	NPCC is a national coordination body for law enforcement in the UK and the representative body for British police chief officers
PLAC	Previously Looked After Children	Children who have been in the care of the Local Authority but ceased to be because they were adopted (or became subject to a child's arrangements order or a special guardianship order)
PSHE	Personal, Social and Health Education	A non-statutory subject which forms part of the personal development curriculum and allows pupils to learn about themselves, other people, rights, responsibilities and relationships
PHE	Public Health England	An executive agency of the Department of Health and Social care which aims to protect and improve the nation's health and wellbeing
QTS	Qualified Teacher Status	A requirement in England to work as a teacher in ether a state or special school
RSHE	Relationship, Sex and Health Education	A statutory component of the curriculum covering primary and secondary education sectors, that teaches pupils about different relationships, consent, the promotion of healthy relationships and sexual health which is age appropriate
SCR	Single Central Record	A statutory secure record of all employees, volunteers and regular visitors to the school which documents evidence that checks have been completed to ascertain their suitability to work with children. For employees this should evidence records of pre-employment checks
SENCo	Special Educational Need Co-ordinator	A statutory role within schools maintaining oversight and coordinating the school's special educational needs

		policy and provision to support pupils with special educational needs
SEND	Special Educational Needs and Disabilities	A term to describe pupils who have specific needs which may be a barrier to their learning. Pupils who are identified as SEND should have clear recommendations for school staff which allow them to access their learning
SLT	Senior Leadership Team	Senior members of school staff responsible for strategic decision making with responsibilities for specific areas within the school
TRA	Teacher Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching professions
VSH	Virtual School Head	The named person within the Local Authority with responsibility for promoting the education and welfare of looked after children, previously looked after children and children with a social worker

6. Definitions

The terms "children and child" refer to anyone under the age of 18.

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting pupils from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children's mental and physical health and development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity of they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16. However, the age of consent for sharing nude or semi-nude images is 18.

Sexual violence refers to the following offences as defined under the Sexual Offences Act 2003

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

Assault by penetration: A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.

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

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.

Sexual "jokes" and taunting.

Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.

Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:

- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Sharing unwanted explicit content.
- Up-skirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

Up-skirting refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Up-skirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of up-skirting.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos, colloquially known as "sexting", is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, "indecent imagery" is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

7. Legal Framework/Statutory/Non-Statutory Guidance and Other Relevant Policies

This policy has a due regard to all relevant legislation and statutory guidance including but not limited to, the following:

Legislation

- Children Act 1989 (legislation.gov.uk)
- Children Act 2004 (legislation.gov.uk)
- Safeguarding Vulnerable Groups Act 2006 (legislation.gov.uk)
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (legislation.gov.uk)
- Sexual Offences Act 2003 (legislation.gov.uk)
- Female Genital Mutilation Act 2003 (legislation.gov.uk)
- Serious Crime Act 2015 (legislation.gov.uk)
- Apprenticeships, Skills, Children and Learning Act 2009 (legislation.gov.uk)
- Equality Act 2010 (legislation.gov.uk)
- Counter-Terrorism and Security Act 2015 (legislation.gov.uk)
- UK General Data Protection Regulation | ICO
- Data protection: The Data Protection Act - GOV.UK (www.gov.uk)
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (legislation.gov.uk)
- Voyeurism (Offences) Act 2019 (legislation.gov.uk)
- Domestic Abuse Act 2021 (legislation.gov.uk)
- Marriage and Civil Partnership (Minimum Age) Act 2022 (legislation.gov.uk)
- Online Safety Act - GOV.UK
- Martyn's Law: the SIA's new regulatory role - GOV.UK

Statutory guidance

- HM Government Multi-agency practice guidelines: Handling cases of Forced Marriage (publishing.service.gov.uk)
- Multi-agency statutory guidance on female genital mutilation - GOV.UK (www.gov.uk)
- Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK (www.gov.uk)
- Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism (publishing.service.gov.uk)
- Keeping children safe in education - GOV.UK (www.gov.uk)
- Working together to safeguard children - GOV.UK (www.gov.uk)
- Prevent duty guidance - GOV.UK (www.gov.uk)
- Disqualification under the Childcare Act 2006 - GOV.UK (www.gov.uk)
- Alternative provision - GOV.UK (www.gov.uk)
- Supporting pupils with medical conditions at school - GOV.UK (www.gov.uk)
- Working together to improve school attendance - GOV.UK (www.gov.uk)

Non-statutory guidance

- Child abuse concerns: guide for practitioners - GOV.UK (www.gov.uk)
- Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)
- Child sexual exploitation: definition and guide for practitioners - GOV.UK (www.gov.uk)
- Child exploitation disruption toolkit - GOV.UK (www.gov.uk)

- Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)
- Recruit teachers from overseas - GOV.UK (www.gov.uk)
- Virginity testing and hymenoplasty: multi-agency guidance - GOV.UK (www.gov.uk)
- Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk)
- Keeping children safe in out-of-school settings - GOV.UK (www.gov.uk)
- Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK (www.gov.uk)
- Mental health and behaviour in schools (publishing.service.gov.uk)
- Support for pupils where a mental health issue is affecting attendance: effective practice examples (publishing.service.gov.uk)
- Employer's guide to right to work checks: 28 February 2023 (accessible version) - GOV.UK (www.gov.uk)

This policy operates in conjunction with the following school policies as applicable:

(Please adapt as relevant to your school. Some of the policies listed below have been incorporated into this over-arching policy). You must ensure that all school policies below that apply are consistent with the information in the Emmaus CAT Safeguarding and Child Protection Policy.

- Children Missing Education Policy
- Child Sexual Exploitation (CSE) Policy
- Prevent Duty Policy
- Child-on-child Abuse Policy/Anti-Bullying Policy
- Behaviour/Exclusion Policy
- Online Safety Policy (including filtering and monitoring/Acceptable User Agreement)
- CCTV Policy
- Staff Behaviour/Code of Conduct policy
- Social Media Policy
- Use of School Devices Policy
- CPOMS Policy
- School Trips and Visits Policy
- Administration of Medicines Policy
- Intimate Care Policy
- Safer Recruitment Policy
- Looked After Children's Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Photography Policy
- Attendance Policy
- Home Visits Policy
- Data Protection Policy
- Lockdown / Critical Incident Policy
- Trust Safeguarding Supervision Policy

8. Roles and responsibilities

DSL

The DSL is a member of the school's senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding. Please refer to Annex C of KCSiE a full description of the DSL's responsibilities. In the absence of the DSL, the Deputy DSL will provide appropriate cover. All deputies are trained to the same standard as the designated safeguarding lead and the role is explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility is not delegated.

Please see appendix 5 for the current details of all Emmaus CAT DSLs.

The DSL or DDSL will be available during school hours for staff to discuss any safeguarding concerns. Out of term cover is contractual in some settings and additionally email advice can be sought from the Emmaus CAT Directors of Safeguarding.

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

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

Where the DSL is not the Headteacher, the DSL within each school setting will keep the Headteacher informed of any issues and liaise with LA case managers and designated officers for child protection concerns as appropriate.

The full responsibility of the DSL is set out in their job description. The Emmaus CAT Directors of Safeguarding will support the strategic umbrella for safeguarding throughout the year. The Emmaus CAT Directors of Safeguarding will work closely with all school DSLs who hold responsibility for safeguarding and line managing the DDSLs in their respective areas. The DSL will lead with active casework, maintain meticulous records, track trends, report the safeguarding picture to key stakeholders and drive a climate of continuous improvement to keep all members of the school safe and well. The DSL will have responsibility for managing the safeguarding training process for staff, ensuring that all school staff and Governors receive regular and appropriate safeguarding training.

DSL support

The DSL will receive professional safeguarding supervision from the Emmaus CAT Directors of Safeguarding, in line with the Emmaus CAT Safeguarding Supervision Policy and Working Together to Safeguard Children recommendations. Professional supervision will be both 1:1 and within regular peer DSL networks facilitated by Emmaus CAT Directors of Safeguarding.

The Emmaus CAT Directors of Safeguarding are available to provide complex case management support and general safeguarding advice and guidance to all DSLs.

Safeguarding and Governors

The School Governors have strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The Local Governing Body ensures that school adopts a whole school approach to safeguarding. In addition:

- There will be a safeguarding update within each Headteacher's report.
- The DSL will provide an update for governors at relevant meetings.
- The Governors undertake an annual review of the Safeguarding and Child Protection Policy.
- The Chair of Governors will immediately liaise with the LADO regarding any allegation made against the Headteacher.
- Support the Emmaus CAT safer recruitment policy.
- All governors will read updated legislation and guidance including KCSiE.
- The Governing body makes every effort to ensure the child's wishes and feelings are considered when determining what action to take and which services to provide should there be a safeguarding concern, through effective quality assurance and challenge.

Lead Governor for Safeguarding

All Emmaus CAT schools have a Lead Governor for Safeguarding (LGS) who has received appropriate training in Safeguarding and Child Protection for Governors. The LGS will ensure that every member of the Governing Body who sits on interview panels has completed Safer Recruitment Training. The LGS works closely with the Headteacher and DSL to promote safeguarding. The role of the Lead Governor for Safeguarding includes the following duties:

- Together with the Headteacher, the Lead Governor for Safeguarding and DSL undertakes an annual review of the school's Safeguarding and Child Protection procedures and of the efficiency with which the related duties have been discharged to ensure that the school is safeguarding and promoting the welfare of pupils.
- Work with the DSL on safeguarding policies to be presented to the Governing Body.
- Works with the DSL to ensure that appropriate filtering and monitoring systems are in place and reviewed at least annually and any deficiencies or weaknesses in Safeguarding and Child Protection arrangements are remedied without delay.
- Ensure the SCR is regularly reviewed and any issues are addressed promptly.
- Ensure the DSL has the time and resources to carry out the duties of their role.
- Together with the Governing Body, approve amendments to Safeguarding and Child Protection arrangements in the light of changing regulations or recommended best practice at least annually.
- Meet with the DSL regularly to discuss safeguarding matters.

The role of the Headteacher

The Headteacher has overall responsibility for all safeguarding concerns involving the school (including historic). Key responsibilities of the Headteacher include the following duties:

- The Headteacher is responsible for appointing the DSL.
- The Headteacher is responsible for overseeing the communication with the LADO relating to any accusation made against any member of staff or volunteer (including supply teachers and third-party agency staff) in accordance with LA and school procedures.
- The Headteacher will act as a 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

- The Headteacher is responsible for liaising with the LADO and other relevant safeguarding partners with regard to any historic safeguarding concerns.
- The Headteacher will ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- The Headteacher (via the DSL) is responsible for ensuring that all staff and volunteers have received appropriate safeguarding training and that this training is up to date and a record is kept.
- The Headteacher, together with the DSL, is responsible for appropriately supporting, in line with legislation, all children and staff when abuse occurs or allegations of abuse are made.
- Ensuring the relevant staffing ratios are met, where applicable in EYFS.
- Making sure each child in the EYFS is assigned a key person.

Designated teacher

The designated teacher has a responsibility for promoting the educational achievement of CLA and previously LCLA/(PLAC), any child with a social worker, any child in kinship care, and for children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales. More information regarding the role of the Designated Teacher can be found in the local authority Looked After Children Policy.

All staff

Safeguarding is a fundamental part of each person's role within school. Staff will promptly report safeguarding concerns, in line with school procedures and ensure policies and guidance are followed as directed by the DSL.

Staff will:

- Ensure they listen to the pupil and report concerns accurately, always following the school safeguarding procedures.
- Actively participate in regular safeguarding training and safeguarding updates.
- Read and understand all policies and procedures relating to safeguarding and seek clarification as required.
- Report concerns about members of staff in line with school procedures (see appendix 3).
- Work within a culture of vigilance and adopt a mindset of "it could happen here."

9. Multi-Agency Working

Emmaus CAT contributes to multi-agency working as part of its statutory duty. Each school will follow the local safeguarding arrangements within their LA (as listed in appendix 5)

Emmaus CAT will be fully engaged, involved, and included in local safeguarding arrangements. The CAT follows its statutory duty to cooperate with LA published arrangements in the same way as other relevant agencies.

Emmaus CAT will work with CSC, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the CAT will allow the CSC within the relevant LA to conduct (or consider whether to conduct) a Section 17 assessment or Section 47 Enquiry under the Children

Act 1989 A section 17 assessment gathers all important information about all children living in a household and their family to assess need and risk. A Section 47 Enquiry might also be referred to a Child Protection Enquiry, carried out to assess if there is the risk of significant harm to the child the CAT also recognises the particular importance of inter-agency working in identifying and preventing CSE.

Information sharing

Emmaus CAT recognises the importance of proactive information sharing between professionals and local agencies to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not over-ride their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or Deputy DSL.

10. Early help

Early help enables the provision of support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, although staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHCP.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into 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.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a Pupil Referral Unit
- Are missing education or persistently absent from school or not in receipt of full time education
- Are at risk of modern slavery, trafficking or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Are viewing problematic and/or inappropriate online content e.g. linked to violence, or developing inappropriate relationships online
- Have a parent or carer in custody or is affected by parental offending.
- Are in family circumstances presenting challenges for the child, such as drug or alcohol misuse, adult mental health issues or domestic abuse.
- Misuse of drugs or alcohol.
- Are at risk of Honour Based Abuse such as FGM or forced child marriage.
- Are privately fostered.
- Has returned home to their family from care

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSC for assessment for statutory services if the pupil's situation is not improving or is worsening.

11. Categories of abuse

How do I know a child or young person is being abused?

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in a school setting by those known to them or by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. The term *'child'* is used to include all children and young people who have not yet reached their 18th birthday.

Child abuse is categorised as:

Physical abuse

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g. rape or oral sex), or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. Sexual abuse includes non-contact activities, such as involving children in looking at, including online and with mobile phones, or in the production of pornographic materials, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. In addition, sexual abuse includes abuse of children through sexual exploitation.

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent effects on the child's emotional development, and may involve:

- Conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal

social interaction; (See the UK government guidance). Working together to safeguard children - GOV.UK

- Seeing or hearing the ill-treatment of another, e.g. where there is domestic violence and abuse.
- Serious bullying, causing children to frequently feel frightened or in danger.
- Exploiting and corrupting children.
- Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs and is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse, maternal mental ill health, learning difficulties or a cluster of such issues. Where there is domestic abuse and violence towards a carer, the needs of the child may be neglected. Once a child is born, neglect may involve a parent failing to:

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs. Included in the four categories of child abuse and neglect above are a number of factors relating to the behaviour of the parents and carers which have a significant impact on children, such as domestic violence. Research analysing serious case reviews has demonstrated a significant prevalence of domestic abuse in the history of families with children who are subject to statutory child protection plans. (Child KN 15 Cath Connor Nottingham Safeguarding Children's Board 2019; Child K Karen Tudor Wiltshire Safeguarding Children's Board 2019). Children can be affected by seeing, hearing and living with domestic abuse, as well as by being caught up in any incidents directly, whether to protect someone or as a target. It should also be noted that the age group of 16- and 17-year olds has been found in recent studies to be increasingly affected by domestic violence in their peer relationships (peer relationship patterns and their association with types of child abuse and adolescent risk behaviours among youth at risk of maltreatment - D Yoon 2020.)

12. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff should be made aware of these issues and these should form the basis or regular refresher training.

Appendix 2 of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

13. Child-on-child abuse

KCSiE defines child-on-child abuse as abuse between children. The school has a zero-tolerance approach to abuse, including child-on-child abuse. All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online.

All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. In fact, schools must assume it is happening and ensure pupils are aware of how to report incidents of child-on-child abuse.

All staff will speak to the DSL if they have any concerns about child-on-child abuse. All staff will understand the importance of challenging inappropriate behaviour between pupils and will not tolerate abuse as "banter" or "part of growing up". Child-on-child abuse can be manifested in many ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as 'teenage relationship abuse'.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse or by-standing.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Up-skirting.
- Initiation and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- By-standing – although not taking part in the bullying, may show the perpetrator that they support them by being there.
- Cyber-bullying including but not limited to name calling using social media and other online platforms, creating groups where abuse takes place, sharing inappropriate material about someone without their consent, creating videos of gifs about someone that all parties would identify with that person, even if they are not named directly, and using social media platforms such as *Tik Tok, Instagram* and *Snapchat* to exclude or talk about someone in their absence.
- Exclusion – where someone is deliberately excluded or ostracised from a group.
- Racially motivated name calling.
- Misogyny and voluntary incelibacy (INCEL)

All staff will understand the importance of challenging inappropriate behaviour between pupils and will not tolerate abuse as "banter" or "part of growing up".

All staff will be fully conversant with the school's policy and procedures in respect of child-on-child abuse and the role they have in preventing it and responding where they consider a child might be at risk.

Pupils will be empowered to raise concerns or make a report. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school will maintain accurate records in respect of child-on-child abuse that can enable statistical analysis against protected characteristics for example, age, disability, gender reassignment, race, religion, sex and sexual orientation.

The school's procedures for managing allegations of child-on-child abuse are outlined in the school's Child-on-child Abuse/Anti-Bullying Policy. Staff will follow these procedures, in addition to the procedures outlined in the school's Suspension and Exclusion Policy, where appropriate.

14. Harmful Sexual Behaviours

Context

Children who display harmful behaviour and children affected by harmful behaviour

First and foremost, it is crucial that everyone within school recognises that sexually harmful behaviour happens in schools. Staff need to adopt the view "it could happen here". To this effect safeguarding training will be provided for all members of the school community, to promote a diligent safeguarding culture in which such situations receive a swift, proportionate and timely response that meets the needs of all affected.

There are many ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have caused harm by their behaviour. It is important that school staff recognise that not everyone who has been subjected to sexual violence and/or

sexual harassment considers themselves a 'victim' or would want to be described in this way.

Ultimately, school staff should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable. For this advice we use the term 'children displaying harmful behaviour'. It is important to remember that, as a child, any child displaying harmful behaviour is entitled to, deserving of, and should be provided with, a different level of support to that which might be provided to an adult who is alleged to have abused a child.

What is sexual harassment and sexual violence?

Responsibilities

Schools have a statutory duty to safeguard and promote the welfare of the children. As part of this duty school staff are required to have regard to KCSiE. Emmaus CAT schools are required by law to have a behaviour policy and measures in place to prevent all forms of bullying and provide relationship education. Our schools play an important role in preventative education. Good practice is that which allows children an open forum to talk things through and all staff should be aware of how to support children and how to manage a disclosure.

Schools should have in place a meaningful and expert led RSE curriculum which allows for open and honest discussions about relationships.

Responding

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Some situations are clear:

- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.

- Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves.

Schools are not alone in dealing with sexual violence and sexual harassment; statutory partners such as CSC and the police may need to become involved in some cases. It is likely that any issues will extend beyond school. Online issues and the use of various social media platforms can extend the impact of the abuse. This is also the case for children using public transport and school transport; school leaders still have a duty to respond to all incidents they are made aware of. Even if the child has not reported directly, the school's duty to promote the welfare of children and young people remains the same i.e. that friends/peers have shared their concerns to school. It is essential that children are reassured that they are being taken seriously and will be supported and kept safe as far as is possible. A child who has been affected by abuse should never be given the impression they are creating a problem, nor should they be made to feel ashamed for making a report.

Practitioners should:

- Not promise confidentiality.
- Inform the child of the next steps.
- Be supportive and respectful.
- Be non-judgemental, listen to what the child is saying to you.
- Never ask leading questions, use open questioning.
- Record the disclosure under the appropriate heading for data purposes (devote time to listening to what the child is saying, write notes if it is appropriate) and use the exact words the child spoke.
- Only record the facts as the child presents them. Opinions should be labelled correctly in the report.
- Inform the DSL immediately.

When to inform the child, who is the subject of an allegation will be a decision that should be carefully considered. Where a report is going to be made to CSC and/or the police, then, as a general rule, the school DSL should speak to the relevant agency and discuss next steps and how the child who is the subject of an allegation will be informed of the allegations. The DSL should consider the following: -

- Parents or carers should normally be informed (unless this would put a child at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to children's social care.
- Rape, assault by penetration and sexual assaults are crimes and must be reported to the Police. The DSL will decide whether to contact CSC. If the DSL is not available then it is school staffs responsibility to contact the Police and CSC. Leaving school without sharing information is not an option.

Where there has been a report of sexual violence the DSL should make an immediate risk assessment including:

- The child who has been affected by the behaviour.
- The child who has displayed the behaviour.
- Other children (and sometimes staff).
- Lessons where both parties are together.
- Transport to and from school.

- Risks that may occur outside of lessons and outside of school.

Risk assessments should be recorded (written or electronic) and should be kept under review with a date identified for the review. A suitable risk assessment can be accessed here: https://www.brook.org.uk/ourwork/category/sexual-behaviours-traffic-light-tool

Key school staff should be mindful of any police bail conditions. However, they should act independently. For example, when bail conditions lapses, this should not be an automatic indication that the level of risk has decreased.

More information regarding managing incidents of sexual violence in school can be found in KCSiE 2024 page 159 (and section 5 of KCSIE 2024).

Supporting Young People through Criminal Cases

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, school leaders should be aware of anonymity, witness support and the criminal process in general so they can offer support and act appropriately. An 'appropriate adult' is required to support the child during any formal statutory interview process.

In addition to the legal protections, as a matter of effective safeguarding practice, school leaders should do all they reasonably can to protect the anonymity of any child involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be in place for the children involved. School leaders should also consider the potential impact of social media in facilitating the spreading of rumours and exposing children's identities.

Thresholds

In some cases of sexual harassment, for example one-off incidents, school leaders may take the view that the children concerned are not in need of statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and bullying policies and by providing pastoral support. Advice should be sought in these situations from the Emmaus CAT Directors of Safeguarding.

All concerns, discussions, decisions and reasons for decisions should be recorded on CPOMS and always discussed with the DSL. School leaders may decide that the children involved do not require statutory interventions but may benefit from an early help assessment. Therefore, all relevant parties can assemble to review actions and have a clear action plan to support the pupils involved.

Where a child has been harmed, is at risk of harm, or is in immediate danger school leaders, via the DSL, should make a referral to local CSC. In some cases, CSC will review the evidence and decide a statutory intervention is not appropriate. The DSL should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If you do not receive a satisfactory response please contact the Emmaus CAT Directors of Safeguarding who can intervene to offer support. If a statutory assessment is not appropriate, the DSL should consider how best to support the pupils involved such as, specialist support and pastoral support.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is this must be passed on to the Police. If a child is convicted or receives a caution for a sexual offence, the school leaders should update the risk assessment, ensure relevant protections are in place for all the children at the school and, if it has not already, and consider any suitable action in light of their behaviour

policy. If the child accused remains in the same school as the child alleging harm, the school leaders should be very clear as to their expectations regarding the child who has been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school leaders consider to be reasonable and proportionate with regard to the child's timetable.

Ongoing responses

School staff should consider the age and the developmental stage of the child affected by the behaviour, the nature of the allegations and the potential risk of further abuse. Staff should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the parties. Consider the proportionality of the response. Support should be tailored on a case-by case basis.

The support required regarding a one-off incident of sexualised name calling is likely to be vastly different from that for a report of rape. Children who have been affected by harmful behaviour may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, school staff should ask the child who has been affected if they would find it helpful to have a designated trusted adult (for example their form tutor or DSL) to talk to about their needs.

The choice of any such adult should be the child's. School staff should respect and support this choice and support the trusted adult to support the child. If required, school staff should provide a physical space for the child to withdraw and additional time to facilitate meetings. As with any other safeguarding concern, care should be given to the transfer of information and the wider social issues such as the involvement of the wider family network.

It is also important to recognise that harmful sexual behaviour between children can have a wider impact. The person receiving the information might have experienced trauma in the past and could be affected by dealing with the situation. Consider pastoral support/counselling for any staff involved as part of the risk assessment process, recognising the duty of care owed to staff and volunteers within your school.

15. Online safety, emerging digital harms, filtering and monitoring and personal electronic devices

Each school must have an Online Safety Policy and adhere to this at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online behaviour.
- The procedures to follow if a pupil attempts to access content on school devices which is known to be banned or identified by the filtering systems.

The school will ensure that suitable filtering and monitoring systems are in place on ICT equipment to prevent children accessing inappropriate material, in accordance with the school's Data and Cyber-security Breach Prevention and Management Plan. School leaders will understand that filtering means that systems block inappropriate content from being accessed and monitoring flags when a pupil attempts to access content that has been blocked by school. Schools must have both systems in place. The school will be working towards meeting the governments guidance on Meeting Digital and Technology Standards in Schools and Colleges. The school will ensure that filtering and monitoring systems that do not cause over blocking, which may cause unreasonable restrictions as to what people can be taught online. The DSL and Lead Governor for Safeguarding will monitor and regularly review these arrangements in line with KCSiE requirements.

All staff should be clear on:

The expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of their safeguarding training. For example, part of their role may be to monitor the content on pupils' screens. Staff must be aware and be able to articulate the software used by their school to filter and monitor content.

Staff must report safeguarding concerns if:

- They witness or suspect unsuitable material has been accessed.
- The pupils are able to access unsuitable material.
- They are teaching topics that could create unusual activity on the filtering logs.
- There is failure in the software or abuse of the system.
- There are perceived unreasonable restrictions that affect teaching and learning or administrative tasks.
- They notice abbreviations or misspellings that allow access to restricted materials.

School leaders should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet your safeguarding needs.

- Complete the 'Plan technology for your school - GOV.UKl' self assessment tool and be familiar with the guidance on Generative artificial intelligence (AI) in education - GOV.UK usage in school.

KCSiE guidance now signposts to a new online service 'Shore Space' (Lucy Faithfull organisation)

Home - Shore which offers confidential support and early intervention for young people concerned about sexual thoughts or behaviour.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The school will use face to face opportunities to offer training to parents on how to keep their child safe online. The school and curriculum areas will make it clear to parents what their children are being asked to do online for school and the risks associated with that.

Reviewing online safety

School leaders will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risk faced by pupils. This will include an annual review of filtering and monitoring systems. Filtering and monitoring systems will also be audited if there is:

- A serious breach of the school systems
- A change of provider

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the school's own policies and procedures.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve pupils who are CLA, adopted pupils, or pupils for whom there are security concerns, the Headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are CLA or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the school's procedures.

Staff will be made aware of the challenges that social media presents in the education sector. They will be given advice as to how to manage their own social media profiles safely and given training on school rules and expectations regarding social media. This is covered in the Staff Code of Conduct.

All schools are expected to have as policy on the use of mobile phones in school. This can be included in the school's behaviour policy.

Up-skirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of up-skirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera. Upskirting is considered to be Harmful Sexual Behaviour.

Up-skirting will not be tolerated by the school. Any incidents of up-skirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

16. Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will follow school guidance in dealing with instances of sharing nudes and semi nudes in the school community. This includes understanding motivations, assessing risks posed to pupils depicted in the images and how to report this to the DSL. Staff will be given advice on how to remove the image from the internet and prevent further sharing.

Staff will be made aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised. More information regarding this can be found in UKCIS guidance Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People.

Where a member of staff becomes aware of an incidence of sharing nudes and semi-nudes, they will refer this to the DSL as soon as possible. They must not under any circumstances view the image themselves. They should take possession of the device and refer to the DSL who will follow their school safeguarding procedures.

17. Context of safeguarding incidents

Many safeguarding incidents can occur out of school and can be associated with outside factors. All staff, particularly the DSL and Deputy DSLs, will know and understand the context of the school and where external safeguarding factors will occur. Staff should always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making a referral to CSC.

18. Pupils at potential risk of greater harm

The school recognises that some groups of pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

Pupils who need social workers or are open to early help

Pupils may need social workers due to safeguarding and welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence and promoting welfare, e.g. considering the pastoral or academic support.

Absences and changes in circumstances should be reported to the child's Social Worker

Electively home educated pupils

Parents may choose elective home education (EHE) for their children. This can pose additional safeguarding concerns if a pupil is not visible. All staff should be aware of the additional concerns associated with a child being withdrawn for elective home education. These concerns include: the risk of modern slavery and child sexual exploitation. School staff should not remove a child from their roll unless they have written permission from the LA, to enable them to have appropriate safeguarding and due diligence measures in place. If a child is within the social care system, the social worker should be informed immediately. If a child has SEND needs, is vulnerable or who has a social worker, there should be a meeting called immediately. If not already in place, an EHA should be completed. Children who are in receipt of an EHCP or on a Child Protection Plan should not be removed from the school roll until the LA have been informed of the parent's intention and have agreed.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Flexi school

Any school who enters into a flexi schooling agreement with parents must ensure that they follow the relevant guidance ensuring that children are safeguarded whilst away from school. (see below paragraph 10.7)

This is at the discretion of the Headteacher and will only be offered in exceptional cases after thorough consideration involving all stakeholders.

Elective home education: departmental guidance for local authorities (publishing.service.gov.uk).

Children absent from education

Children who miss long periods of school are at greater risk of harm. All staff should be aware of any child who is deemed to be persistently absent or severely absent, including inexplicable and deliberately missing education. There should be processes in place to ensure safeguarding is effective when off site. This should be through the use of home visits and regular meetings to assist in the child

returning to full time education. Further information regarding this can be found in the school's attendance policy and Working Together to Improve School Attendance.

CLA and PLAC

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care. The school should be knowledgeable about trauma informed behaviours when making decisions to support pupils who fall under this bracket. The Emmaus CAT Directors of Safeguarding can offer further advice and guidance to schools in this area.

School leaders will ensure that staff have the knowledge, skills and understanding to keep CLA and PLAC safe. This includes ensuring that the appropriate staff have the information they need, e.g.

- Looked after legal status e.g. whether a child is looked after under voluntary arrangements (section 20) with consent of parents, or an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL/Designated Teacher will be provided with the necessary details of pupils' social workers and the VSH and for PLAC, personal advisers. This should be easily accessible and on the school MIS system.

Further details of safeguarding procedures for CLA and PLAC are outlined in the school's/LA CLA policy.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour changes and injury may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability.
- Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs. More information can be found in the school's Anti-Bullying/Child-on-Child Abuse Policy.
- Communication barriers may exist, as well as difficulties in overcoming these barriers. This may impact on the child's ability to report concerns.
- Children with SEND may have more difficulty in understanding how to keep themselves safe. More consideration must be given to the teaching of safeguarding with this group of pupils.

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue, relating to a pupil with SEND, the DSL will liaise with the school's SENCo, as well as the pupil's parents, where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ Pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm, however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals.

Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

KCSiE recognises that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Best practice should include provision for a named

teacher within school to help reduce the additional barriers faced by LGBTQ+ pupils and provide a safe space for them to speak out and share any concerns they have.

Children who express a desire to undertake a gender re-assignment process should be referred for EHA or if there is a significant risk of harm or a requirement for more intensive support, CSC. Please refer to the latest government guidance in relation to this issue.

Pupils Requiring Mental Health Support

All staff will be aware of the needs and requirements of individual pupils who may require additional support for their mental health. Staff must be made aware of any risk assessments that are in place to support the safety of pupils and the wider school community. Staff must also be aware that mental health issues can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering abuse, neglect or exploitation.

The school should have an appointed lead for mental health in school who will have received appropriate and funded training.

19. Use of school premises for non-school activities

Where school leaders hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the school, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. School Leaders should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate.

This applies irrespective of whether children who attend any of these services or activities are on the school roll. The governing body should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Extra-curricular clubs and charities should work collaboratively with the school to effectively safeguard pupils and adhere to local safeguarding arrangements. Organisations should provide evidence that shows safeguarding arrangements are in place.

Staff and volunteers running extra-curricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSC or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

20. Alternative Provision

The school will remain responsible for a pupil's welfare and education during their time at an alternative provision (when the school are the commissioning body). When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding and safer recruitment checks and will complete the Emmaus CAT AP auditing tool.

Schools must acquire written confirmation (including satellite sites) from AP providers that they have carried out safeguarding checks and schools must be informed of staff changes affecting risk. Schools must track the location/address of placements at least half termly to ensure suitability and attendance, terminating placements if necessary.

Emmaus CAT does not support the use of unregistered provision for any pupil within its schools. EHCP and CLA pupils must not use unregistered provision commissioned by the school. If the school becomes aware that the provider is allowing any CLA or children with an EHCP from other schools, they should cease using the provision immediately. In certain cases, the LA may commission unregistered AP to satisfy section 19 of the Education Act. In these cases, the school should obtain the written offer with confirmation that all safeguarding checks have been completed and details of how the LA intend to monitor safeguarding arrangements and progress.

School leaders should conduct a thorough safeguarding and educational audit of any alternative provider and ensure robust safeguarding procedures are in place, especially around attendance. Please use Emmaus CAT Alternative Provision Audit Tool.

Further information can be obtained from Alternative provision - GOV.UK and Emaus CAT policy for The Use of Alternative Provision.

21. Work Experience

If a school uses external providers for work experience, school staff must ensure that the provider has appropriate safeguarding policies and procedures in place, including safer recruitment procedures.

Where the school is used for work experience by others, enhanced DBS certificates, where applicable, will need to be obtained and the person must be added to the SCR.

Mandatory guidance for schools can be found here A new chapter for career guidance: updated Gatsby Benchmarks adopted into government guidance for schools, colleges and ITPs | Gatsby Benchmarks

22. Homestay Exchange Visits

Host families - homestay during exchange visits

Schools sometimes make arrangements for children to take part in exchange visits, either to other parts of the UK or abroad. Exchanges can benefit learning across a range of subjects. In particular foreign visits can enrich the languages curriculum and provide exciting opportunities for pupils to develop their confidence and expertise in the use of other languages.

School staff have a duty to safeguard and promote children's welfare. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school

arranges, and when organising the care and accommodation for a child with a host family (known as homestays) as part of the exchange. Homestay families should be subjected to an enhanced DBS check with barred list information, to inform its assessment of the suitability of the response of adults.

Where criminal record information is disclosed, school staff will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

School staff will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. School staff will use professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement, and the school is not the regulated activity provider.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where school staff become aware of a pupil being privately fostered, they will notify the DSL who will notify CSC as soon as possible.

23. What to do If you are concerned about a child

Information regarding the specific procedures for the school can be found in **Appendix 1.** Please refer to this section of the policy to fully understand the following:

- How to report a concern about a child.
- Specific guidance about how to make a referral.
- A flow chart of what happens when a concern is reported.

24. Managing referrals

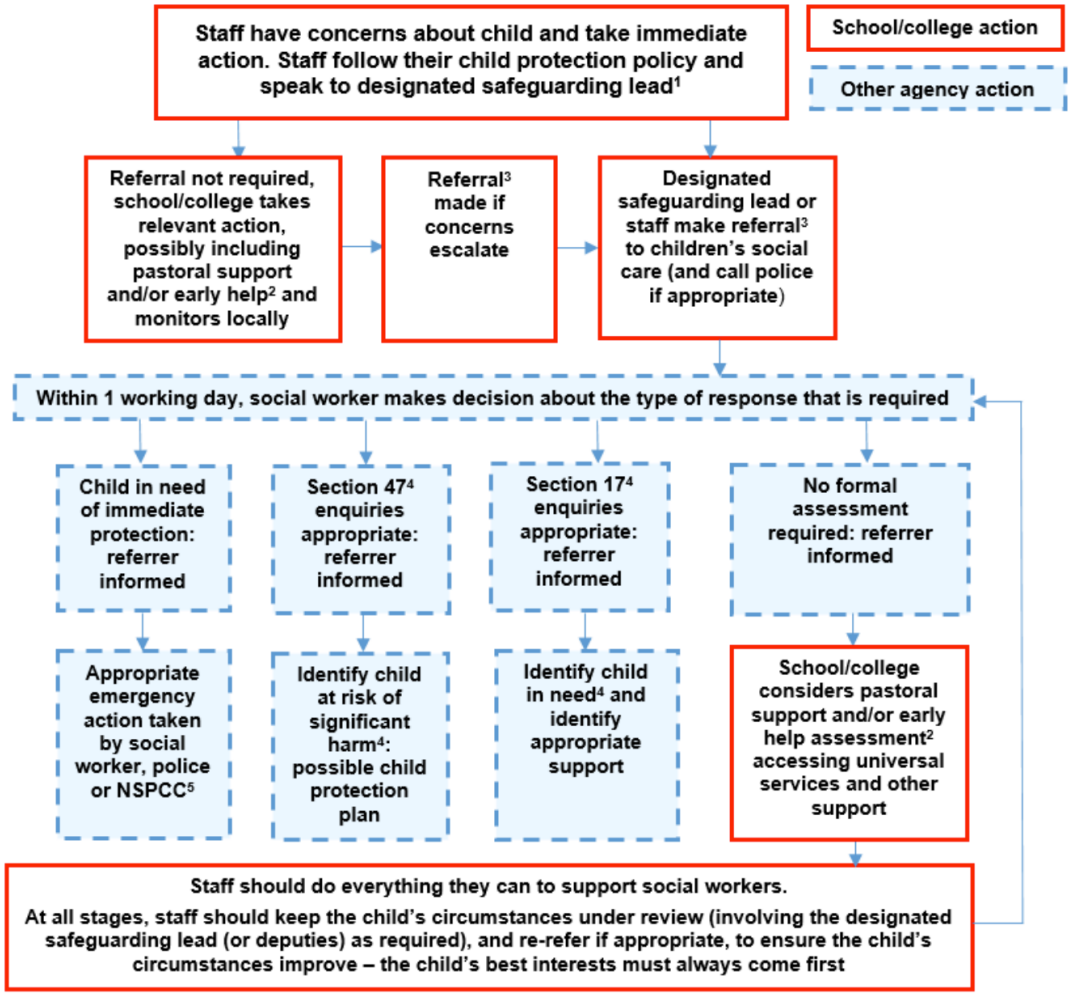
Each school will know and understand how to refer into the LA CSC and other safeguarding partners. (See appendix 5).

The school will not wait for the start or outcome of an investigation before protecting the child at risk and other pupils; this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate, the school leaders will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSC decide that a statutory investigation is not appropriate and the school leaders agree with this decision, the school will consider the use of other support mechanisms, such as EHA and pastoral support. If school leaders disagree

with the decision of the Referral and Assessment Team, they should challenge the decision through the appropriate channels. Where the LA escalation policy is used, Emmaus Directors of Safeguarding must be informed.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

Please see **Appendix 5** for key information regarding the referral processes for each LA within the CAT. The CAT safeguarding policy should be used in conjunction with the Local Authority Safeguarding Practices for each school.



25. Safeguarding concerns and allegations against staff

It is important that staff within the school foster an attitude of "it could happen here" and allegations might be made. Staff must report any behaviour they feel may pose a risk to the pupils in their school.

If something does not look or feel right, then the chances are it requires professional curiosity. School leaders will ensure that all allegations against staff, including those who are not employees of the school are dealt with appropriately and school leaders liaise with all relevant parties.

When managing allegations against staff, school leaders will recognise the distinction between allegations that meet the harms threshold and those that do not, also known as "low-level concerns" as defined in KCSiE. Allegations that meet the harms threshold could include, but are not limited to the following instances:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or possibly committed a criminal offence relating to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Been negligent in following safeguarding policies or procedures.
- Behaved or may have behaved, in a way that indicates they may not be suitable to work with children.

Concerns that meet the threshold should be referred to the LADO via the LA reporting procedures.

Low level concerns should be reported to the Headteacher/DSL and a record should be kept securely following school procedures.

All Allegations of abuse against staff must also be reported to the CAT Directors of Safeguarding. Further information can be found in Appendix 3.

26. Communication and confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. This should be done with the pupil's best interest in mind. Sharing of information regarding safeguarding matters should be undertaken on a need to know basis and this should be fully risk assessed and reviewed by the DSL.

Communication between staff should be done professionally through school recognised communication platforms. Staff should not communicate with other staff on a professional basis through their own personal emails or social media platforms. Communication should be respectful and dignified at all times and there should only be an expected response during accepted work hours. School staff should be mindful of their audience when communicating information within group emails.

When communicating safeguarding information staff should be mindful of keeping the child's best interests as a priority, whilst fulfilling safeguarding obligations.

When communicating with individuals outside of the school community, secure emails must be used. If that is not possible then documents and data should be password protected and the password should be sent in a separate email.

Emails should carry a data protection statement in the signature with guidance for situations where an email is received in error.

Communication with parents/carers

Information should only be shared with an adult who is named on the school's MIS, unless they are a recognised agency. Sharing of information should happen with parental consent unless parental consent puts the child at further risk.

More information around sharing of information can be found in KCSiE.

27. Safer recruitment

Despite safeguarding policies being in place it remains a disturbing fact that a minority of individuals will continue to seek access to children in order to exploit and inflict harm. Ongoing vigilance contributes to creating a diligent safeguarding culture and following good safer recruitment processes is a critical first line deterrent. School leaders must acknowledge abuse happens and "**it could happen here"**.

For anyone working with children or vulnerable adults, the law requires the fulfilment of numerous duties to keep them safe. Fundamentally, people who are barred from certain activities involving children and vulnerable adults must not work for any school. Working with children or vulnerable adults is classed as 'regulated activity'. In an educational setting, 'regulated activity' is defined as teaching, training, instructing or supervising children if the person is unsupervised, or; providing advice or guidance on physical, emotional or educational wellbeing, or, driving a vehicle only for children, e.g. school transportation.

Key elements of safer recruitment practice in schools

Safeguarding must be considered at every stage of the recruitment process; planning, advertising, interview and appointment.

- When writing the job description, it must include responsibility for safeguarding children.
- The person specification must include reference to suitability to work with children.
- The job advert must state that any successful candidate will be subjected to an enhanced DBS check (with barred list for teaching staff) and for specific management posts a S128 check, and that online checks will be carried out for all applicants invited for interview.
- Carefully select the panel for recruitment.
- Decide who will shortlist and interview the applicants.
- Anyone involved in the shortlisting process should be appropriately trained in safer recruitment.

The recruitment panel

The recruitment panel must have relevant safeguarding training to successfully appoint a candidate. The panel must:

- include at least one person who has attended safer recruitment training within the last 2 years. It is good practice for all leaders and Governors in the school who are involved in the recruitment process to complete online safer recruitment training annually.
- On receipt of applications, check the application form, including employment and/or experience history, and ensure that any gaps or anomalies are satisfactorily explained such as: unexplained gaps in employment, repeated or frequent job changes, anomalies or

discrepancies in the information provided. (These must be checked at the shortlisting stage and challenged at interview).

All applicants must complete an application form.

Schools will adopt a fair and methodical approach to shortlisting. The use of a grid to assess the candidate against the essential and desirable criterion is good practice.

References

References must be obtained from the current and previous employer with the appropriate seniority. If the reference is from a school or college, this should be from the Headteacher or a member of the senior leadership team, before the interview process begins. Offers of employment must only be given subject to satisfactory references. School leaders should:

- Do not accept open references.
- Not rely on applicants to obtain their own references.
- Obtain verification of the candidates most recent, relevant period of employment where the candidate is not currently employed.
- Secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer is received.
- Verify any information with the person who provided the reference.
- Ensure electronic references originate from a legitimate source/work email address.
- Contact referees to clarify content where information is vague or insufficient, especially around safeguarding.
- Compare the information on the application form with that in the reference and take up any discrepancies with the candidate.
- Establish the reason for the candidate leaving their current or more recent post.
- Ensure any concerns are resolved satisfactorily before the appointment is confirmed.

References are an important part of the recruitment process and should not hold up proceedings. References should be requested using a proforma which addresses the candidate's suitability to work with children. Any issues arising from references should be queried with the referee and discussed with the candidate at interview.

Invitations to interview should remind candidates to bring all relevant documents, such as last DBS record if they have one, qualification certificates, proof of identity and right to work in the UK. Only original documents can be accepted. If copies are provided at interview, the successful candidate must provide the originals before being confirmed in post. Take photocopies of documents and keep them on the personnel file of the successful candidate.

Interview

Setting Interview Questions - It is important that questions enable the panel to assess the candidate's ability to meet the requirements of the role and their suitability to work with children.

Consider other selection methods to help make good recruitment decisions, rather than relying solely on panel interviews. Interview processes such as presentations, in tray exercises, pupil panels and preparing and delivering lessons can be useful in assessing the candidate's motivation and attitude towards children, especially those who are vulnerable.

Decide how to score candidates fairly. The assessment of all the selection activities should be collected on a structured assessment sheet such as a candidate assessment matrix. The candidate assessment matrix should be kept with a record of the interview sheets and application forms.

Panel interviews must include specific safeguarding questions such as what they would do if they have concerns about a child and what they would do if they had concerns about the behaviour of other staff members.

Successful candidates

When a successful candidate is decided upon, a conditional offer of employment may be made. Normally this is done verbally and then confirmed in writing. To comply with KCSiE, all offers of employment must be conditional upon satisfactory completion of pre-employment checks.

Pre-employment checks

Under normal circumstances, candidates must not take up their position until all pre-employment checks are complete. Appointed candidates should not commence work until at least their identity and right to work in the UK has been verified.

A candidate may start prior to the receipt of a DBS check; however, they should not be left unsupervised and a risk assessment must be carried out. This should be approved by school leaders including the DSL, to consider the risks and to identify any measures that can be put in place to mitigate those risks. It is good practice to adopt a coloured lanyard system to clearly identify an adult's status in school.

Pre-employment checks consist of:

Identity checks

It is vital that schools are certain that the person they intend to employ is the person they claim to be and must be aware of the potential for people to change their name. Employers must see sufficient evidence to satisfy themselves of this. Photographic evidence that includes a date of birth e.g. passport or driving license is the most suitable form of identification. If these are not available you should ask to see at least three documents that show the individuals name and address and/or date of birth (e.g. utility bill, paper driving license, birth certificate). There is further guidance on identity checking on GOV.UK website. A copy of the documents should be kept on the employees file and details recorded on the SCR.

Right to work in the UK check

By law an employer must check all job applicants have the right to work in the UK, including EU nationals, before making a job offer. The Home Office Right to Work Checklist should be used, which shows the acceptable documents to verify an individual's right to work.

The Employer's Guide to Right to Work Checks sets out how to conduct either a manual document-based or an online right to work check.

Enhanced DBS including Children's Barred List Check

To be eligible to request a check of the Children's Barred List, a person must be working in regulated activity. If the applicant is eligible for a Children's Barred List check, this should be requested when applying for an Enhanced DBS (criminal record) check. This can be done by selecting 'Children's Barred List check' when initiating an online DBS application

If, exceptionally, the setting needs the applicant to start work before the DBS disclosure has been received, a separate (standalone) check of the Children's Barred List should be requested only where eligibility to undertake the check has been determined by the setting. The applicant must be subject to supervision until the DBS disclosure is received.

DBS Checks

The employer will not receive a copy of the DBS certificate. School staff must ask the applicant to bring in their original disclosure certificate so that the relevant details can be recorded on the SCR. If a candidate has subscribed to the DBS update service, they should still provide the original certificate.

Overseas Criminal Record Checks

These are required for roles that are eligible for DBS checks and where the individual has spent over three months abroad (in one country), within the last five years and they were over age 16. The individual is responsible for applying for this check. There is further information available at: https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants

Academic and Professional Qualifications

School leaders must verify that a potential employee has achieved the qualifications that they claim in their application and view each original qualification or a properly certified copy of those documents.

If a candidate achieved their qualifications overseas, the National Recognition Information Centre for the United Kingdom https://www.enic.org.uk/ (UK NARIC) should be contacted for confirmation of equivalence of qualifications obtained overseas.

For teachers, if an employer is in any doubt about the authenticity of a qualification, they can check Teacher Status Checks through the DfE sign in account.

Prohibition from management check Section 128 Barring Direction:

KCSIE requires of schools that individuals engaged in 'management roles' must be subject to an additional pre-employment check to make sure they are not prohibited from taking part in the management of the school.

A Section 128 Direction prohibits or restricts a person from taking part in the management of a school. This should take place or all staff who are involved in leadership roles within school or central team within a trust.

Health

It is important to ensure individuals are physically and mentally fit to do the job before a firm offer of employment (issued once all pre-employment checks are completed to a satisfactory standard) is made and they start work. This is the responsibility of schools following conversion to Emmaus CAT.

Disqualification checks in relation to the Childcare Act 2006

All staff who are employed to work in early years settings or who provide care in after school clubs or breakfast clubs (including the manager or head teacher) for children aged under 8 must disclose anything that is a relevant offence (defined within the 2006 Act). They must also disclose where they live with someone who has a relevant offence as defined by 2006 Childcare Act.

All school leaders must ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State (see paragraph 253 of KCSiE) for

prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE (General Teaching Council for England) (see paragraph 255), before its abolition in March 2012.

Before employing a person to carry out teaching work in relation to children, school leaders must take reasonable steps to establish whether that person is subject to a prohibition order issued by the Secretary of State.

All documentation gathered as part of the recruitment exercise must be stored securely and confidentially for the duration of an employee's employment and 6 years thereafter. For unsuccessful candidates, all documentation relating to the recruitment process should be kept for at least 6 months to ensure the school can rely on its records should any claim arise subsequently. This should include:

- The advert
- The job description/person specification or role profile
- The candidate application pack
- The completed application forms
- Shortlisting notes and grid
- Invite to interview letters
- Interview notes
- Notes of any feedback provided

28. Single Central Record (SCR)

Information about school staff (including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day, governors, trustees and regular visitors to the school must be kept on the school's single central record. Fee-funded trainee teachers should be recorded on the SCR.

For agency and third-party supply staff, the SCR must include whether written confirmation has been received. It must be evidenced that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates. This must include the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

The following checks must be recorded on the SCR:

- An identity check
- A standalone children's barred list check
- An enhanced DBS check (with children's barred list check) requested/certificate provided
- A prohibition from teaching check
- Further checks on people who have lived or worked outside the UK
- A check of professional qualifications, where required
- A check to establish the person's right to work in the UK
- Section 128 checks for school leaders and trustees
- Whether staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements
- Checks made on Governors and Volunteers
- Dates when safer recruitment and safeguarding training was completed
- Employee online checks

- The name of the person who carried out each check.

Emmaus CAT will hold the SCR centrally and have responsibility for updating central team details/records.

The DSL and Directors of Safeguarding will routinely carry out checks on the SCR to monitor gaps or discrepancies in information. Action plan will be generated as an outcome where required to ensure compliance. The Lead Governor for Safeguarding should ensure an SCR check is carried out a termly basis and ensure any issues identified are addressed promptly.

It is the DSLs responsibility to ensure that the SCR is complete and up to date. The LGS also has a role in supporting the DSL to achieve compliance in this area.

The details of an individual should be removed from the SCR when their employment within the school ceases.

Fee funded trainee teachers

It is the responsibility of the initial teacher training provider to carry out the initial checks. Schools must obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school would otherwise be required to perform, and that the trainee has been judged by the provider suitable to work with children. The DSL should see a copy of the written confirmation.

Regular visitors

People who are regular visitors to the school should be held on the SCR. Visitors who come to school in a professional capacity should have their ID checked and photo ID must be presented. A DBS Certificate is not required to be presented for visitors or professionals and internal school procedures should be followed. Health and Social Care professionals (and any other professional undertaking regulated activity) should have a letter of assurance from their employer to verify that relevant checks have been completed.

If there are any doubts regarding the authenticity or lack of information regarding the status of a visitor attending school in a professional capacity, then school staff should not allow unsupervised access to children.

29. Handling Disclosures

Guidelines for responding to a person making a safeguarding disclosure

Whenever a child reports that they are suffering or have suffered significant harm through abuse or neglect, or have caused or are causing harm to others, the initial response should be limited to listening carefully to the child. If someone makes a disclosure this might be the only time they will tell someone about what is happening.

How to respond

- Listen.
- Take what is said seriously.
- Only use open questions (open questions begin with words like: who, what, when, where and how. Open questions cannot be answered with a 'yes' or 'no').

- Remain calm. It might be that the information is shocking or upsetting to you but do not react. (It is important, however, to acknowledge the impact this has had on you as soon as possible after the event with a colleague).
- Consider the person's age and level of understanding.
- Check, if face to face, whether they mind you taking notes while they talk so you can make sure you capture the information accurately. At the end you can check with them that you have understood everything correctly.
- Offer reassurance that disclosing is the right thing to do.
- Establish only as much information as is needed to be able to tell the DSL what is believed to have happened, when and where. The more times a child has to repeat their information the more traumatic this can be. The full disclosure will need to be made to the statutory agencies with professionals who have specific skills in this area.
- Check out what the child hopes to result from the disclosure.
- Tell the child what you are going to do next.

Do not:

- Make promises that cannot be kept (e.g. that you won't share the information).
- Make assumptions or offer alternative explanations.
- Investigate. That is the responsibility of the statutory agencies. If you try to investigate you could compromise a police investigation further down the line.
- Contact the person about whom allegations have been made.
- Do a physical or medical examination.

Recording

- Make some very brief notes at the time, if appropriate, and write them up in full detail as soon as possible afterwards.
- Record the date, time, place and the actual words used.
- Record facts and observable things, not your interpretations or assumptions.
- Don't speculate or jump to conclusions.

It is acceptable to state opinion but this must be clearly quantified as such.

Reporting

- Report the matter to the DSL immediately. If there is immediate danger to a child contact the police.
- The DSL will advise regarding reporting to children's social care and/or the police. This must be done within 24 hours. If there is a risk of immediate danger, this should be done straight away and without delay. If in any doubt seek advice from children's social care and/or the police.

The Emmaus CAT Directors of Safeguarding are also available to advise and offer guidance.

Disclosure from a child who has caused harm

A disclosure may be made by a child who is a convicted offender or from a child who is disclosing previously unreported abuse. It is not unusual for a child to make a disclosure in school as often this can be deemed a safe place with school staff being stable positive adult role models in their otherwise

disrupted lives. The motive for admitting what has happened may be a desire to address the problem and obtain help and it can bring a sense of relief for a child when they have disclosed. The person who admits to a potential offence against a child must be told that the information will **not** be kept confidential and that the information will be passed on to children's social care and/or the police.

Be supportive but do not seek more details than you need. Report immediately to the DSL.

30. Recording and Reporting

All concerns, discussions and decisions made with the reasons for those decisions, should be recorded in writing using CPOMS. This will also help if/when responding to any complaints about the way a case has been handled by the school.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the DSL or DDSL

Please refer to Emmaus CAT CPOMS guidance which can be found in appendix 1 mand the Emmaus CAT CPOMS Policy.

31. Training

All staff must undertake regular safeguarding training to be sufficiently equipped to recognise, respond to and action safeguarding concerns.

DSL/DDSL

The DSL/DDSL is required to undertake specific training for their role at least every two years. However, they should seek opportunities to educate themselves on new and ongoing issues that reflect the school context.

Headteacher /Lead Governor for Safeguarding

The Headteacher/Lead Governor for Safeguarding should undertake DSL training to fully understand the role of the DSL in school and be able to make strategic decisions. They should also receive specific training about making referrals to LADO and managing staff allegations.

All staff

All staff should fully engage with safeguarding training throughout the academic year. This may include but is not limited to:

Induction training

Induction training should include how to report concerns including concerns about staff, the context of the school and key information regarding the school culture including expectations of all staff. Induction training should also include information regarding filtering and monitoring, including what to do if systems are infiltrated and who to report concerns to and the roles of responsibilities to do with filtering and monitoring.

Face to face training for all staff

This should include information about the context of the school and any changes in school policies, procedures or practice. A diligent safeguarding culture should be promoted that reinforces the fact that "it can happen here". Face to face training should include any statutory requirements and guidance updates.

Online training

Online training in safeguarding in education should be completed every three years. However, good practice advises it should be undertaken more regularly. Prevent duty training is an bi-ennial requirement. However, staff must ensure they remain compliant with the latest guidance requirements. School staff should be encouraged to use the DfE PREVENT training as outlined below:

Prevent duty training - GOV.UK (www.gov.uk)

Online training modules can be accessed for specific safeguarding issues that maybe particular to the school or to a member of staff within their role.

TES Develop have a wide range of online modules, including Safeguarding in Education and Safer Recruitment Training, and is free to use if the school subscribes to TES for their recruitment. TES Develop allows the school to keep accurate records of completed training modules.

School Online CPD and Training |TES

Record Keeping

Records of safeguarding training must be retained by the DSL. This should include:

- A record that staff have received and read key safeguarding policies including safeguarding child protection policy (Including child missing from education), staff code of conduct, online safety policy, school behaviour expectation policy and child on child abuse policy.
- Staff have received and read part 1 and Annex A of the most recent version of KCSIE.
- Have competed annual prevent duty training.
- A record of completed online safeguarding training.
- A record of completed face to face training including KCSIE updates.

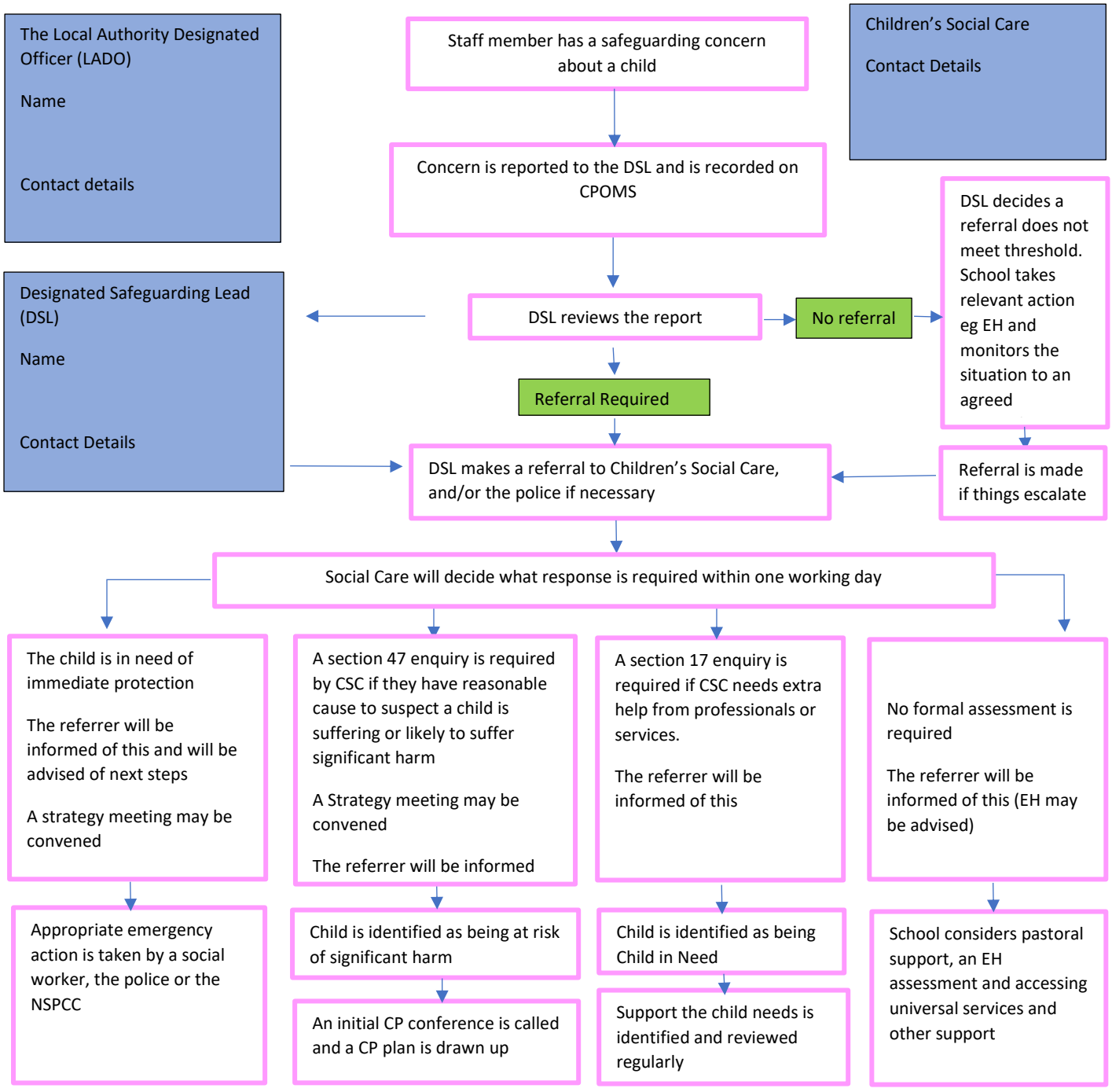
The school should keep a record of all completed safeguarding training. This includes the dates the training was completed and the certificates achieved. There must be an up to date log acknowledging that staff have received and read all policies relating to safeguarding in addition to part 1 of KCSiE.

32. Monitoring and review

This policy is subject to annual review, and additionally when changes to legislation and/or guidance is issued. The CAT and all school governing bodies will exercise their responsibilities in monitoring and reviewing line with their statutory obligations.

Appendix 1

Flowchart of procedures for responding to safeguarding concerns



All concerns must be logged on CPOMS. The child's circumstance will be kept under review at all stages and a referral will be made again if it is appropriate for improving the child's circumstances. The child's best interest must always come first

If the concern is about a staff member/ volunteer in your school, the DSL/ Headteacher should refer this to the LADO who will determine the best route of action

If your concern would involve a Prevent /Channel referral contact:

If you have a concern that a girl has undergone, or is about to undergo, FGM, contact the police and CSC immediately

Appendix 2

Other Specific safeguarding issues

This appendix clarifies specific safeguarding issues that pupils may experience and outlines responses to be taken. These issues include but are not limited to:

1. Domestic abuse
2. Homelessness
3. Attendance and safeguarding interactions
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cybercrime
7. Child sexual exploitation (CSE)
8. Modern slavery
9. FGM
10. Virginity testing and hymenoplasty
11. Forced marriage/child marriage
12. Radicalisation
13. Pupils with parents or carers in prison
14. Pupils required to give evidence in court
15. Mental health (including eating disorders, self-harm)
16. Serious violence
17. Fabricated illness (formerly known as Munchhausen's by proxy)

Domestic abuse

In line with the Domestic Abuse Act 2021, "domestic abuse" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. Abusive behaviour includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. Personally, connected includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse.

All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Operation Encompass

Operation Encompass is an initiative whereby the police notify schools when they attend incidents of domestic abuse or violence where there is a child of school age living in the household, whether they are present at the incident or not.

With this information, the DSL can appropriately risk assess the situation ad take appropriate action to ensure the safety of the child or children involved.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSC where a child is being harmed or at risk of harm. For 16 and 17-year-olds, homelessness may not be family based and referrals to CSC will be made as necessary where concerns are raised. An early help assessment should be completed for anyone who is at risk of becoming homeless.

Attendance and Safeguarding Interactions

Children absent from education

A child who is absent from school is a potential indicator of abuse or neglect and, as such, these children are potentially at an increased risk of being victims of harm, exploitation or radicalisation.

Staff will monitor pupils missing from the school, particularly on repeat occasions, and liaise with the DSL in line with school and LA safeguarding procedures, The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school’s permission for a continuous period of 10 school days or more. Children whose whereabouts cannot be established must be brought to the immediate attention of the LA and where appropriate the police should complete a safety and welfare check.

Admissions Register

Pupils are placed on the admissions register at the beginning of the first day agreed by the school, or when the school has been notified of their start date. School staff responsible for admissions will notify the LA within 5 days of when a pupil’s name is added to the admissions register.

School staff will ensure the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Parents must be actively encouraged to report any change of circumstances that will affect the admissions register.

A school cannot retrospectively delete a pupil's name from the admissions register. A pupil's attendance must be recorded up until the date that the pupil's name is deleted from the Admissions register. Further information can be found in the DfE statutory guidance Working together to improve school attendance - GOV.UK

A minimum of two emergency contacts must be held for each pupil.

Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA in line with procedures.

When a parent notifies the school that their child is residing at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the child will live.
- The new address.
- The date from when the child will live at that address.

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school.
- The date on which the pupil first attended, or is due to attend, that school.

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data. To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who will be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. elective home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the school.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries of their attendance.

A pupil should not be removed from the admissions register without written confirmation from the LA.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil.
- The full name and address of any parent with whom the pupil lives.
- At least one telephone number of the parent with whom the pupil lives.
- The full name and address of the parent with whom the pupil will live, and the commencement date

- The name of the pupil's new school and the pupil's expected start date.
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

The school will work with the LA and within current attendance guidance to reintegrate pupils into full time education.

The school will also provide any other contextual information, including safeguarding concerns in line with school procedures.

Child abduction and community safety incidents

Child abduction is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the child, and strangers.

All school staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils. Appropriate risk assessments should be considered in such circumstances.

Pupils will be provided with practical advice in lessons to ensure they can keep themselves safe outdoors for example stranger danger strategies. This will be underpinned by a carefully planned and well sequenced PSHE curriculum.

Child criminal exploitation (CCE)

Child criminal exploitation is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the child needs or wants.
- For the financial advantage or other advantage of the perpetrator or facilitator.
- Through violence or the threat of violence.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Encouraging children to accrue drug debts to foster dependency leading to drug trafficking.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

School staff will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual and will follow school safeguarding procedures.

School staff will also recognise that pupils of any gender are at risk of CCE. School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Experiencing changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.

- Regularly missing school or education or not taking part.

County Lines

County Lines refers to gangs and organised criminal networks that exploit children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

In addition to the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider a referral to the National Referral Mechanism on a case-by-case basis, in line with statutory agency arrangements and other providers who offer support to victims of county lines exploitation.

Cyber-crime

Cyber-crime is defined as criminal activity committed using computers and/or the internet (including mobile phones).

This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence e.g. corruption of school IT networks.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

Child sexual exploitation (CSE)

Child sexual exploitation is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants.
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator.
- Through violence or the threat of violence.

School staff recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media.

School staff recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity.

School staff also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Experiencing changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly absent from school or education or not taking part.
- Having older partners.
- Having sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, school staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA as appropriate. The LA will then provide/advise on the appropriate response.

Modern slavery

Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour.

This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. School staff will also be aware of the support available to victims of modern slavery and referral processes to the National Referral Mechanism.

Examples of Modern Slavery can include but are not limited to:

- Car washes.

- Home help/housekeeping.
- Manual labour especially on building sites.
- Farm labouring.
- Travelling fairgrounds/circuses.
- Inexpensive childcare provision.

FGM

FGM is defined as any procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs.

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

School staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSC and/or the police.

The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18.

Teachers failing to report such cases may face disciplinary action or prosecution. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they are under a **legal obligation** to personally report to the police where an act of FGM appears to have been carried out. The DSL must be notified of any situation involving known or suspected FGM and school safeguarding procedures must be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE and PE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo routine medical examinations.
- Asking for help, but not being explicit about the issue due to embarrassment or fear.

FGM is included in the definition of "'honour-based' abuse (HBA)",

which involves crimes that have been committed to defend the honour of the family and/or community.

All forms of HBA are forms of abuse and will be treated and escalated as such.

Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK.

It is also illegal for UK nationals and residents to carry out the practice outside of the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination - this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place, irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse.

Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control.

Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage.

Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings. The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications.

School staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out.

School staff will educate pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure. Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status.

Any teaching of this material will be underpinned by agreed RSE policies.

School staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help.
- Family members disclose that the pupil has already undergone the practices.
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously.
- Concern from family members that the pupil is in a relationship, or plans for them to be married.
- A close relative has been threatened with either procedure or has already been subjected to one.
- A pupil has already experienced or is at risk of other forms of HBA.
- A pupil is already known to social services in relation to other safeguarding issues.
- A pupil discloses other concerns that could be an indication of abuse, e.g. they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling.
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour.
- A pupil appears fearful of their family or a particular family member.
- Unexplained absence from school, potentially to go abroad.
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment.

The above list is not exhaustive, but if any of these indicators are identified, school staff will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

Forced/child marriage

Forced/child marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. It is illegal for a marriage to take place where one of the participants is under the age of 18. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND.

Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced. All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from continuing to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or Headteacher and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced Marriage Unit.

The DSL or Headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously. It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils. If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm.

The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

School staff will familiarise themselves with how they can support victims of forced/child marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to CSC and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced/child marriage – school staff will use existing national and local protocols for multi-agency liaison with police and CSC.

School staff will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

School staff will establish where possible whether pupils at risk of forced /child marriage have a dual nationality or two passports.

School staff will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced/child marriage is discussed openly within the curriculum and support and counselling are provided routinely.

School leaders will adopt a whole school approach towards educating pupils about forced/child marriage and this should be embedded in the school culture and curriculum. In particular the school's RSHE curriculum will incorporate teaching about the signs of forced/child marriage and how to obtain help and support.

Pupils will be sign posted to appropriate materials and sources of further support. They will be encouraged to access appropriate advice, information and support. School staff will be educated through CPD about the issues surrounding forced/child marriage and the signs to look out for.

Radicalisation

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

Extremism refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. It can include calling for the death of members of the armed forces. (this definition is currently under review at Sept 24 and is subject to amendment) Please see New definition of extremism (2024) - GOV.UK (www.gov.uk) for more information.

Terrorism refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system.

The use or threat of these actions is designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause. Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. School staff will be alert to the risk of pupils being radicalised and drawn into extremism and/or terrorism and follow local safeguarding procedures.

School staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. School staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a referral to CHANNEL through the Prevent duty.

The school will work within local safeguarding arrangements at all times. School staff will ensure that they engage with parents and families, recognising they are often in a key position to spot signs of radicalisation. However, parents may also be influential in such behaviour, hence the need for a **comprehensive risk assessment** that covers this issue**.**

Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result. The DSL and all school staff will undertake Prevent awareness training appropriate to their role.

Under the Prevent Duty, section 26 of the Counterterrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent duty".

The Prevent Duty will form part of the school's wider safeguarding obligations.

Pupils with parents or carers in prison

Pupils with parents or carers in prison will be offered pastoral support as necessary. Early Help considerations should always be included here. They will receive a copy of 'Are you a young person with a family member in prison?' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. [Primary schools only]. Pupils will be provided with the booklet 'Going to court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns. [Secondary schools and post-16 settings only]. Pupils will be provided with the booklet 'Going to court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns. These booklets have been updated in 2024.

Children Giving Evidence in Court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Pupils will be provided with the relevant age appropriate booklets below:

ywp-5-11-eng.pdf (publishing.service.gov.uk). ywp-12-17-eng.pdf (publishing.service.gov.uk). These booklets have been updated in 2024.

Mental Health

School staff will be made aware that mental health issues can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation. School staff will not attempt to make a mental health diagnosis as this will be carried out by qualified mental health professionals where necessary.

Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health difficulty or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will speak to the DSL or deputy DSLs in the first instance to obtain advice and guidance. The school will utilise a range of resources to assist in identifying pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Mental Health Policy will be referred to.

Children whose attendance is impacted by mental health issues should be offered early help. Positive mental health and wellbeing, including strategies to improve mental health should be included in the school's curriculum.

Serious violence

Through training, school staff will be made aware of the indicators which might signal a pupil is at risk from, or is involved with, serious violent crime.

These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence.

These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Fabricated or Induced Illness (FII)

Fabricated or induced illness (FII) is a **rare** form of child abuse. It happens when a parent or carer exaggerates or deliberately causes symptoms of illness in the child. The parent or carer tries to convince doctors that the child is ill, or that their condition is worse than it really is.

The parent or carer does not necessarily intend to deceive doctors, but their behaviour is likely to harm the child. For example, the child may have unnecessary treatment or tests, be made to believe they're ill, or have their education disrupted.

FII used to be known as "Munchausen's syndrome by proxy" (not to be confused with Munchausen's syndrome, where a person pretends to be ill or causes illness or injury to themselves).

Signs of fabricated or induced illness

Fabricated or induced illness (FII) covers a wide range of symptoms and behaviours involving parents or carers seeking healthcare for a child. This ranges from exaggerating or inventing symptoms, to deliberately making the child ill.

Behaviours in FII can include a parent or carer who:

- persuades healthcare professionals that their child is ill when they're healthy
- exaggerates or lies about their child's symptoms
- manipulates test results to suggest the child is ill, for example, by putting glucose in urine samples to suggest the child has diabetes
- deliberately induces symptoms of illness, for example, by poisoning their child with unnecessary medicine or other substances

- Cases where the parent or carer wrongly reports symptoms are much more common than cases where they induce illness in the child

Why fabricated or induced illness happens

The reasons why FII happens are not fully understood. The parent or carer will have a need for their child to be treated as if they're ill, or as being more unwell than they really are. Their behaviour is intended to convince doctors that the child is ill.

This may be because the parent or carer gains something, such as attention, support or closeness to the child. Alternatively, it may be because they have anxiety or incorrect beliefs about their child's health, and they need these beliefs to be confirmed and acted upon. The parent or carer is not always fully aware of the reasons for their own behaviour. Many parents or carers involved in FII have personality disorders endorsed by emotional instability, impulsiveness and disturbed thinking. Some parents or carers involved in FII have so-called "somatoform disorders", where they experience multiple, recurrent physical symptoms. A proportion of these parents or carers also have Munchausen's syndrome. Some parents or carers have unresolved psychological and behavioural problems, such as a history of self-harming or alcohol misuse. Some have experienced the death of another child. There have also been several reported cases where illness was fabricated or induced for financial reasons. For example, to claim disability benefits.

What to do if you suspect a child is at risk

FII is a child safeguarding issue and needs **specialist guidance and intervention.** Please contact Emmaus CAT Directors of Safeguarding in the first instance.

School staff who suspect FII is happening must report their concerns to the DSL who will liaise with social services and the police and must follow local child safeguarding procedures.

If you suspect someone you know may be fabricating or inducing illness in their child, do not confront them directly. It's unlikely to make the person admit to wrongdoing and it may give them the opportunity to dispose of any evidence of abuse.

Appendix 3

Good working practice (Please also see model template Code of Conduct below)

Staff guidelines

In line with safer working practices, the staff Code of Conduct/Staff Behaviour policy, staff should be guided by safer working practices and the following advice to avoid false allegations and situations which may give rise to misinterpretation:

- Avoid whenever possible unobserved situations of one-to one contact with a child. If they are unavoidable, always keep a door open and try to ensure that staff are within the hearing of another member of staff and there is a clear purpose to the activity.
- Do not transport children alone in a vehicle. If this is absolutely unavoidable, notify the DSL as soon as possible. The child should sit in the back seat of the vehicle in such circumstances. Both the child and member of staff should carry a mobile phone. Any concerns must be reported immediately to the DSL and followed up with a written statement.

Staff should be mindful that off-site environments present greater opportunities for contact between children and staff, both formal and informal, and staff in all their dealings with children, should be guided by the following advice:

- Do not engage in or allow any sexually provocative games whether based on talking or touching or engage in "horseplay" involving pupils.
- Never make suggestive or discriminatory comments to a pupil.
- Avoid "favouritism" and singling out "troublemakers."
- Never trivialise child abuse or safeguarding matters.
- Issue clear guidance and codes of conduct to staff and pupils prior to the visit.
- Ensure there is a clear education, Trips and Visits Policy in place that identifies potential safeguarding issues.
- Ensure the school has an appointed Educational Visits Coordinator (EVC) to oversee the organisation and safety of all school trips and visits.
- Ensure all trips and visits are underpinned by detailed risk assessments for the activity.

Safeguarding concerns and allegations against staff or another adult in the school (including supply teachers, volunteers, and contractors):

Safeguarding allegations or concerns (no matter how small) may be made against a member of staff, a volunteer, a governor, a pupil, parent or other person connected to the school. Safeguarding allegations or concerns against staff will be dealt with according to the statutory guidance set out in Part 4 of KCSiE and local authority procedures. It will be followed in respect of all cases in which it is alleged that a teacher or member of staff (including a volunteer) 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; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm if they work regularly or closely with children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children Further information: Making barring referrals to the DBS - GOV.UK (www.gov.uk)

Staff and volunteers who hear a safeguarding allegation or concern (no matter how small) against another member of staff or volunteer must immediately report the matter to the DSL or Headteacher, unless the DSL is the person against whom the allegation is being made, in which case the allegation must be made to the Headteacher. If the accused is the Headteacher it should be reported to the Chair of Governors. In the case of alleged serious harm, the DSL/Headteacher must inform the police immediately.

Where there is a conflict of interest in reporting a matter to the head teacher or DSL the school whistleblowing procedures should be followed.

In the event of a safeguarding allegation being made against a member of staff, the DSL will immediately, and without further investigation, refer the matter to the LADO. **The Emmaus CAT Directors of Safeguarding/ Directors of Education must also be informed**. It is essential that all information pertinent to the case be communicated to the LADO as the failure to pass on a critical piece of information could materially affect the advice given. The LADO's advice will be sought in borderline cases. The LADO's role is not to investigate the allegation but to ensure an appropriate investigation is carried out. Where an investigation by the police or local authority children's social care services is unnecessary, the LADO's advice should be taken as to how the allegation should be dealt

with; it is sometimes appropriate that school leaders (or Emmaus CAT) should investigate the allegation. and, as required, deal with the member of staff in accordance the school's disciplinary procedure. The adult to whom the allegation/concern relates should not be informed without the explicit consent of the LADO.

If there is a conflict of interest in reporting a safeguarding concern to the DSL/Headteacher, or in the event of an allegation being against the Headteacher or a member of the Governing Body, the Chair of Governors or, in their absence, the Lead Governor for Safeguarding (LGS), should be contacted immediately to determine whether the details of the allegation are sufficient to warrant an investigation.

If there is reason to suppose abuse could have occurred, The Chair of Governors in conjunction with Emmaus CAT will take appropriate action. This action should include an immediate referral to the LADO who will provide further advice on how to manage the situation appropriately.

Advice should always be sought from the LADO in any safeguarding allegation. However, the member of staff who an allegation has been made against should be advised to contact their trade union representative, if they have one. The school/Emmaus CAT will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case and offer support where appropriate.

If the allegation or concern relates to a member of supply staff, the agency will be notified and fully involved. Allegations or concerns against a member of staff who no longer works at the school (and historical allegations) will be referred to the police. The parents of the pupil will be informed of the allegation as soon as possible, unless external agencies such as the police advise otherwise. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process through the normal school procedures.

Suspension:

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the school, those concerns should be reported to the DSL, children's social care or the police as required. However, suspension is highly unlikely to be justified based on such concerns alone. Suspension should be considered only in a case where there is cause to suspect a child or other children at the school are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at school or until the allegation is resolved, and may wish to seek advice from their HR officer and the DSL in addition to consultation and guidance from the LADO. In cases where the school is made aware that the Secretary of State has made an Interim Prohibition Order in respect of an individual who works at the school, immediate action should be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work. The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases, an investigation can be resolved quickly and without the need for suspension but the LADO's advice should always be sought. If the DSL, police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to

avoid suspension. Based on a thorough assessment of risk, the following alternatives could be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the school so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not meet the member of staff, making it clear that this is not a punishment and parents have been consulted;
- or temporarily redeploying the member of staff to another role in a different location, for example to an alternative school.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended. If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the DSL (Remember the welfare of the child is of paramount importance.) The record should include what alternatives to suspension have been considered and why these were rejected. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who the named contact is within the school and provided with their contact details. In these cases, decisions are likely to be made in conjunction with other agencies at a LADO managing allegations strategy meeting. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment and views of all professionals involved. Any further action will be taken with in accordance with Part 4 of KCSiE 2024 and the school's employment procedures.

The outcome of investigation of an allegation will record whether it is:

- substantiated (sufficient evidence either to prove or disprove it)
- unsubstantiated (insufficient evidence either to prove or disprove it)
- false (sufficient evidence to disprove it)
- malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive)
- unfounded' (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

If it is established that the allegation is false, unsubstantiated or malicious, no details of the allegation will be retained on the individual's personnel records, and it will not be referred to in employer references. In all other circumstances, a written record will be made of the decision and retained on the individual's personnel file in accordance with DfE guidance. School leaders should carefully consider appropriate action to take where an allegation is deemed to be malicious, in line with the school's behaviour policy.

During the course of the investigation school leaders, in consultation with the LADO and Emmaus CAT, will agree what information should be given to parents, staff and other pupils and how press enquiries

are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils. Parents or carers should be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. Any pupils who are involved will receive appropriate support. Any further action will be taken with in accordance with Part 4 of KCSiE and the school's employment procedures.

Timescales

It is in everyone's interest to resolve cases as quickly as possible and is consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are provided from KCSiE: the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets should be achieved in all but truly exceptional cases. Further advice on this matter can be sought from the LADO. Information regarding contacting the LADO is available in appendix 5. Emmaus CAT Directors of Safeguarding can also be approached for advice regarding any safeguarding issue. In respect of timescales please also make reference to the Emmaus CAT Disciplinary Policy requirements.

If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff, the school will consider making a referral to the Teaching Regulation Agency (TRA) and a Prohibition Order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence). CAT/school leaders will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so. Emmaus CAT can assist with this. CAT/school leaders will report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child. CAT/school leaders will consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be an appropriate action. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in Teacher misconduct: the prohibition of teachers (October 2018). Further guidance is published on the TRA website.

Confidentiality:

It is extremely important that when an allegation is made, school leaders make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. Publication includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public. This means that

any individual who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted.)

The case manager should take advice from the DSL, Police and LADO:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip

The school follows Disclosure and Barring Services (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. The school will report to the DBS, within one month of leaving the school any person (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above. The requirement to make referrals of this nature is a legal duty and failure to refer when the criteria are met is a criminal offence. If the Head teacher is wholly satisfied that the pupil or pupils is/are not at risk of significant harm and that a reportable offence has not been committed, they will consider the separate need for disciplinary action. In that case, an investigation at school level will be appropriate. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should be referred to the police.

Low level concerns

Emmaus CAT promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This includes sharing any concerns about adults, no matter how small, responsibly and with the right person, recorded and dealt with appropriately. Doing so should encourage an open and transparent culture; enable the school to identify any inappropriate, problematic or concerning behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with Emmaus CAT ethos and values.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the local authority harm threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school 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 harm threshold or is otherwise not considered serious enough to consider a referral to the LADO. If in any doubt regarding information shared about a member of staff as a low-level concern meets the harm threshold then the school will consult with the LADO.

Examples of behaviour regarded as a low-level concern could include, but are not limited to:

- humiliating pupils;
- being over 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.
- engaging with pupils on social media platforms.

When dealing with low level concerns all schools will follow the staff code of conduct, behaviour policies and safeguarding policies; ensuring that procedures are implemented effectively, and appropriate action is taken in a timely manner to safeguard pupils. Low level concerns must be reported to the DSL who will inform the Headteacher of such concerns. Alternatively, if preferred, a concern might be reported directly to the Headteacher. If the low-level concern relates to the DSL then such concerns should be reported directly to the Head teacher. If the concern is about the Headteacher then this should be referred to the Chair of Governors.

Reports of low-level concerns will be recorded in writing by the DSL, noting who raised the concern (unless wishing to remain anonymous, which should be respected as much as is reasonable), details of the concern, the context in which the concern arose and the action taken. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

Whistleblowing

All staff are required to report any concerns to the DSL/Headteacher about poor or unsafe safeguarding practices in school; potential failures to properly safeguard the welfare of pupils or any action by staff or pupils that represent a safeguarding risk. If a member of staff feels unable to share a concern with the Headteacher then they should contact the Chair of the Governors. Staff should be aware that the NSPCC whistleblowing advice line – 0800 800 5000/help@nspcc.org.uk – is available for staff who do not feel able to raise safeguarding concerns internally.

The CAT/school's Whistleblowing Policy is available on the school website. It should also be displayed prominently in key places within the school building.

Self-Reporting

If you have been involved in an accident, incident, conversation or situation which has made you feel uncomfortable, that might have been misinterpreted, or you feel might be used against you, report this to the DSL. This might include:

- A suggestive comment from a pupil.
- Accidental or embarrassing physical contact.
- A misunderstanding.
- A confrontation.

- An instance where physical restraint or reasonable force was necessary.
- Situations in which staff have become aware pupils have requested social media profiles or have been named by pupils on social media platforms

All school staff must be made aware of and adhere to the school's policy in relation to conduct and presence on social media. Further information regarding this will be found in the school's Online Safety policy.

Where physical constraint has been used, a log should be maintained by the DSL documenting the date, time and reason this was used.

EXEMPLAR CODE OF CONDUCT FOR SCHOOL STAFF

Introduction

1.1 Emmaus CAT Schools seek to provide a safe and supportive environment, which secures the well-being and absolute best outcomes for pupils in their care. This document clarifies what is expected in terms of professional behaviour.

1.2 In addition to this code, anyone employed under teachers' terms and conditions of employment has a statutory obligation to adhere to the 'Teachers' Standards 2012'. The relevant extract 'part 2 – personal and professional conduct' is contained at appendix 1.

1.3 1.4 Staff should be aware that failure to comply with the code of conduct could result in disciplinary action which may potentially include dismissal. This code does not form part of the contract of employment and can be amended at any time.

1.5 1.6 The code shall apply to all staff (including the Headteacher). This code is supplemented by additional policies and guidance which are listed at appendix 2.

2. Core Principles

2.1 The welfare of pupils is paramount.

2.2 Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

2.3 Staff should work and be seen to work in an open and transparent way.

2.4 Staff should discuss and/or take advice promptly from their line manager or another senior member of staff over any incident, which may give rise to concern.

2.5 Records should be made of any such incident and of decisions made/further actions agreed.

2.6 All staff should know the name of their designated person for child protection, be familiar with safeguarding arrangements and understand their responsibilities.

2.7 Employees should be aware that breaches of criminal law and other professional guidelines could result in criminal or disciplinary action being taken against them.

3. Setting an example

3.1 All staff who work in Emmaus CAT Schools set examples of behaviour and conduct which can be copied by pupils. Staff must therefore avoid using inappropriate and/or offensive language at all times.

3.2 Staff must act as role models, demonstrating high standards of conduct to encourage pupils to do the same. Staff should be aware of and adhere to the school's rules in respect of behaviour such as use of mobile phones, eating/drinking in corridors and classrooms, chewing gum etc.

3.3 Staff must avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

3.4 Staff should ensure that their clothing and appearance promotes a positive and professional image for Emmaus CAT Schools and is in line with the school's dress code.

4. Appointments and other employment matters

4.1 All staff involved in staff appointments and/or tendering processes should ensure that these are made based on merit.

4.2 Staff need to take care that they do not accept any gift that may be construed as a bribe by others or lead the giver to expect preferential treatment. It is acceptable to receive small tokens of appreciation from parents or pupils at Christmas or the end of term. However, if the gift is high value or the employee is concerned that it may be construed as a bribe then it should be reported to the Headteacher.

4.3 Staff must not be directly involved in any staff appointment or decisions relating to discipline, pay, promotion or pay adjustments for any individual who is a relative or with whom they have a close personal relationship. In this event they must inform their Headteacher as soon as they become aware of the application or matter in question.

4.4 Any external work that staff undertake must not bring the school into disrepute or conflict with the school's interests. Any additional work must be reported to the Headteacher.

5. Personal interest

5.1 Staff must declare to the Headteacher any financial interests which could conflict with the school's interests

5.2 All relationships of a business or private nature with external contractors, or potential contractors should be made known to the Headteacher.

5.3 In the case of the Headteacher, any financial interests or relationships of a business or private nature must be declared to the Governing Board.

6. Confidentiality and information disclosure

6.1 Information obtained in the course of employment must not be used to the detriment of the school, for personal gain or benefit or passed on to others who might use it in such a way.

6.2 Staff must take all reasonable steps to ensure that the loss, destruction, inaccuracy, or disclosure of information does not occur because of their actions, including information relating to school business and pupil data. The storing and processing of personal information about children and young people is governed by the Data Protection Act 1998 and the school will give clear guidance to employees about their responsibilities under this legislation.

6.3 There are circumstances where staff are expected to share information about a child, for example, when child protection issues arise. In such cases employees have a duty to pass information on without delay in line with school procedures. If staff are in doubt about whether to share information or keep it confidential, they should seek guidance from the Headteacher / DSL.

6.4 Whilst staff who work with children and young people need to be aware of the need to listen to and support them, they must not make promises to keep secrets, neither should they request this of a child or young person under any circumstances.

7. Use of school facilities, resources, and time

7.1 The school's property and facilities (e.g. stationary, computers, photocopiers, and mobile phones) may **only be used for school business** unless permission for their private use has been granted.

8. Duty of trust and care

8.1 All staff have a duty to keep children safe and to protect them from sexual, physical, and emotional harm. This is exercised through the development of respectful and caring relationships between adults and children and young people and through the behaviour of staff, which **at all times should demonstrate integrity, maturity and good judgement.**

8.2 Staff must, always act in accordance with the trust that the public is entitled to place in them as an employee of the school. Staff are expected to be ready and able, at the agreed times, to carry out their job. Politeness and courtesy should be always expressed to internal and external stakeholders. Care and courtesy must be maintained with appropriate professional boundaries.

8.3 All school stakeholders have a right to be treated fairly and equally and with dignity and respect. Staff should be aware that their behaviour may inadvertently intimidate or offend other staff, parents, pupils, or members of the public.

8.4 Emmaus CAT Schools is opposed to and will not tolerate all forms of discrimination, harassment, victimisation, and bullying and has procedures in place to deal with complaints of this nature.

9. Whistleblowing

9.1 Staff have a duty, without fear of recrimination, to report suspicions or knowledge of any wrongdoing they become aware of, for example:

• activities which they believe to be illegal, improper, unethical, or otherwise inconsistent with the code

• anything which involves, or they think involves, irregularities with money or other property of the school

• school staff, or other individuals, being involved in potentially fraudulent or corrupt activities, or theft.

• school staff, or any other individuals, whose behaviour may cause harm or risk to children / pupils in their care.

9.2 Staff must report any alleged impropriety or breach of procedure to the Headteacher so that the matter may be investigated immediately. If any suspected wrongdoing involves the Headteacher then reports should be made to the chair of the governing body.

10. Conduct outside of work

10.1 Staff must not engage in conduct outside of work which could damage the reputation of the school or the staff's own reputation or the reputation of other members of the school community. Refer to appendix 1, extract from school teachers standards. This includes conduct within social media use.

10.2 Any staff member facing criminal charges must notify their Headteacher as soon as possible whether they feel the matter is relevant to their employment or not.

10.3 Staff need to be mindful of their professional responsibilities and boundaries when they are in employed roles within school where family members attend. This includes appropriate use of social media. Staff should always role model appropriate professional behaviour. Where these staff members host school friends of their children, the head teacher must be informed.

11. Communications (including the use of technology)

11.1 Staff must not give their personal contact details (including their mobile telephone number, home address and e-mail address) to pupils or parents/carers unless there are exceptional circumstances and the Headteacher has granted permission. They should not request any personal information from a pupil.

11.2 Communication with pupils must always take place within appropriate professional boundaries and must be transparent an open to scrutiny. Contact should only be made for appropriate professional reasons.

11.3 'Communication' refers also to the wider use of technology, including mobile phones, text messaging, instant messaging, e-mails, digital cameras, videos, webcams, websites, social networking sites, online gaming, and blogs.

11.4 Internal e-mails should only be used to communicate in line with the protocols laid out within the school's policy on internet and e-mail usage.

11.5 Please refer to the school policy on the use of mobile phones when on school premises.

12. Social media and internet usage

12.1 Staff should not post any comments on social media or the internet that could potentially be defamatory to the school or damage the school's reputation. This includes personal photographs. Comments must not disclose confidential information relating to the school, its pupils, governors, or employees.

12.2 Bullying, harassment and victimisation of staff, pupils or other persons affiliated with the school through online means will not be tolerated and will be subject to disciplinary action.

12.3 Photos and/or personal details of pupils must not be uploaded to any staff member's personal social media account.

12.4 Staff must not allow current or recent pupils access to their social media accounts, including adding them as 'friends.' It is the staff member's responsibility to ensure that their accounts/passwords are secure, and any potential breach should be reported to the Headteacher immediately.

12.5 It is advised that staff do not identify themselves with the school on their personal social media accounts. **If they do identify themselves as an employee of the school, then they must behave appropriately and in line with the school's values.**

12.6 It is advised that staff make all social media profiles 'private' so that pupils and parents do not have access to their personal details and images. Staff should be aware that they leave themselves open to a charge of professional misconduct if inappropriate images of them are made available on a public profile.

12.7 It is advised that staff exercise caution and do not accept friend requests from parents other than where close personal or familial relationships already exist. This must be disclosed to the Headteacher.

12.8 Accessing, marketing, and storing child pornography or indecent images of children is illegal and will invariably lead to a criminal conviction and the individual being barred from working with children and young people.

12.9 Under no circumstances should staff use school equipment to access inappropriate images on the internet, this includes family members, or access any other site which could call into question their suitability to work with children. The same rule applies to the use of the school's equipment by members of staff at home e.g. laptops and tablets. Equipment containing such images or links must not be brought into the workplace. **Staff may take school devices home for the purpose of carrying out school related duties only and under the authority of the Head teacher.**

12.10 If a member of staff becomes aware that they are in an online game with a pupil, they should cease the game immediately. Under no circumstances should staff seek out pupils or parents/carers to share tags/IDs with them to play online games.

13. Photography, video recordings and other creative arts

13.1 Some school activities may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, and safety of pupils. Informed written consent from parents or carers and agreement, where possible from the pupil, should always be sought before an image is taken for any purpose.

13.2 Care should be taken to ensure that all parties understand the implications of the image being taken especially if it is to be used for any publicity purposes or published in the media or on the internet. There also needs to be an agreement as to whether the images will be destroyed or retained for further use, where these will be stored and who will have access to them.

13.3 It is not permitted for staff to take photographs of children for their personal use.

14. Curriculum

14.1 The curriculum can sometimes include or lead to discussion about subject matter of a sexually explicit or sensitive nature and employees may wish to seek guidance from a senior member of staff when responding to pupils' questions. All responses will be in line with the teaching of the Catholic faith. Employees should not enter into or encourage inappropriate or offensive discussions about sexual activity.

15. Intimate care

15.1 A care plan should be agreed and drawn up with parents for all pupils who require intimate care on a regular basis. The views of the pupil should be actively sought where possible when drawing up a care plan. Depending on their age, maturity and ability, pupils should be encouraged to act as independently as possible. This plan should be reviewed regularly. School leaders must ensure an intimate care policy is in place and reviewed annually or when a particular situation requires this.

15.2 Where any changes to the agreed plan are required, consultation should take place with senior staff and parents/carers.

15.3 A record should be made of any variations from the agreed plan and the justification for this and this must be shared with the pupil's parents/carers.

15.4 When assistance is required, employees should ensure that another appropriate adult is in the vicinity and is aware of the task being undertaken.

16. First aid and Medication

16.1 Employees should be suitably trained and qualified before administering first aid and/or any agreed medication. The school will have trained and named individuals to undertake first aid. St Francis Medication Policy/First Aid Policy must be always adhered to.

16.2 Where possible, staff should ensure that another adult is aware of the action being taken. Arrangements will be in place to ensure that parental consent is obtained for the administration of first aid. Parents/carers should always be informed when first aid has been administered and a record made.

16.3 In circumstances where pupils need medication regularly, a health care plan should be in place to ensure the safety and protection of the pupil and the adults working with them.

16.4 School staff in EYFS included in staff ratios must hold a valid paediatric first aid certificate.

17.Extra-curricular activities (including school trips, out of school clubs and overnight supervision)

17.1 Where activities take place off the school site or out of normal school hours, an additional appropriate adult should be present unless otherwise agreed with senior staff.

17.2 Parental consent must always be obtained for the activity.

17.3 Staff should ensure that their behaviour remains professional at all times during such activities and stays within clearly defined professional boundaries.

17.4 Where activities include overnight stays, careful consideration needs to be given to sleeping arrangements and pupils, adults and parents should be informed of these prior to the trip.

17.5 Emmaus CAT Schools First Aid Policy and Medication Policy should be always adhered to and be referenced within the activity/event risk assessment.

More information on this can be found in the schools Educational, Trips and Visits Policy

18. Transporting children

18.1 Where possible and practicable, it is advisable that private vehicles are not used for transport. At least one adult additional to the driver acting as an escort should be available. If private vehicles are being used, the Headteacher should be aware, and the vehicle must be roadworthy. At all times, the driver must ensure that they have appropriate insurance and have business use activated and that maximum capacities are not exceeded in vehicles. Appropriate car seats must be used. Parents must give permission for children to be transported in staff cars.

19. One to one situations

19.1 Staff working in one to one situations with pupils are more vulnerable to allegations and therefore should plan and conduct such meetings accordingly. Every attempt should be made to ensure that the safety and security needs of both employees and pupils are met.

19.2 Meetings should be conducted in an area where there is visual access or with an open door.

19.3 A colleague should be informed about the meeting beforehand, assessing the need to have them nearby.

19.4 Staff should always report a situation where a pupil becomes distressed or angry during a one to one meeting to a senior member of staff.

20. Behaviour management and use of reasonable force

20.1 All staff are expected to adhere to the school's behaviour management policy.

20.2 The use of physical intervention should be avoided wherever possible and should only ever be used in line with the guidance issued within the school's behaviour management policy.

20.3 Under no circumstances should physical force or intervention be used as a form of punishment. The use of unwarranted physical force is likely to constitute a criminal offence.

20.4 Risk assessments should be carried out and individual care plans should be in place in consultation with parents/carers and where appropriate pupils.

20.5 In all cases where physical intervention is employed, the incident and subsequent actions must be recorded. This includes written and signed accounts from all those involved (including the pupil). Parents/carers must be informed of the incident on the same day. A log must be kept and data shared with local governing boards (and Ofsted on request).

20.6 Training will be provided to staff in respect of behaviour management and the use of physical intervention.

20.7 The Safeguarding governor and DSL will be made aware of all incidents and will review documentation.

20.8 Staff must at all times act with the guidance Use of reasonable force in schools - GOV.UK

21. Searching and Confiscation

Searching a pupil for prohibited items is permitted. However, this should be conducted in line with the school's behaviour policy:

- Where possible with another member of staff and with a pupil of the same gender
- After making every effort to inform parents/carers of the search: and the reasons for it.

21.1 The search should take place within the full view of the pupil and the reasons for the search should be clearly explained.

21.2 Under no circumstances should the search involve any intimate parts of the body including underwear.

21.3 Confiscation of prohibited items should take place in line with school procedures. When confiscating banned items, staff should make clear how the pupil will retrieve the item and where it will be stored. Staff should avoid keeping items on their own person and for longer than is necessary. Parents should be informed of items that have been confiscated and a written record kept.

21.4 Safeguarding of pupils should be carefully considered when confiscating items.

21.5 Staff must at all times act within the guidance Searching, screening and confiscation in schools - GOV.UK

22. Sexual contact

22.1 Any sexual contact between a staff member and a pupil is both inappropriate and illegal. This does not just refer to physical contact but also to non-contact activities such as causing children to engage in or watch sexual activity or the production of pornographic material.

22.2 Staff must not pursue sexual relationships with children and young people either in or out of school.

22.3 Staff should avoid any kind of behaviour which could be construed as 'grooming' a pupil such as singling out pupils for special attention and buying gifts for pupils. There should be a clear policy within school for supporting positive pupil behaviour or recognising particular achievements. If there

is any doubt about how a certain behaviour/action may be construed, then staff should speak to their Headteacher beforehand.

22.4 Staff must avoid any form of communication with a pupil which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, e-mail, texts, and physical contact. This includes making sexual remarks about or to pupils and discussing personal sexual relationships within their presence.

23. Social contact

23.1 Staff should not seek to have social contact with pupils or their parents/carers unless the reason for this contact has been firmly established with a senior manager/Headteacher.

23.2 If a pupil or parent attempts to establish social contact or if this occurs coincidentally then the employee should exercise their professional judgement in making a response and must make their manager and the parent of the pupil aware of the situation.

23.3 Where the nature of the employee's role involves work in the community, care should be taken to maintain appropriate personal and professional boundaries.

23.4 Staff who are related to pupils attending school must be mindful of the need to **maintain confidentiality at all times** in respect of other children who attend the school, when having social contact with family members and friends. The Headteacher must be informed in all cases where this applies.

24. Physical contact

24.1 There will be circumstances where physical contact between staff and pupils is entirely appropriate, for example as an integral part of some lessons such as PE, drama, and music. Employees should always use their professional judgement about the appropriateness of physical contact with pupils and where feasible, seek the child's permission before initiating contact.

24.2 Physical contact should only be initiated for the minimum time necessary; it should be appropriate to the age and stage of the pupil and appropriate to the employee's role and the needs of the child. Please refer to sections 15 and 16 for guidance on intimate care and administering first aid and medication.

24.3 Physical contact should never be secretive, or for the gratification of the adult or represent a misuse of authority.

24.4 If a staff member thinks that an incident of physical contact may have been misinterpreted, they must report this immediately to the Head teacher.

25. Personal care

25.1 Pupils are always entitled to respect and privacy and especially when changing clothes, washing/showering or undertaking any form of personal care. Supervision may be required to safeguard young people or satisfy health and safety considerations. This should be appropriate to the needs and age of the pupils concerned.

25.2 Staff must not have any physical contact with pupils when they are in a state of undress, change in the same room as pupils or shower or bathe with them.

25.3 Staff should announce their intention to enter rooms where pupils are changing and avoid any visually intrusive behaviour whilst in the room.

26. Personal living space

26.1 No pupil should be in or invited into the home of a staff member unless the reason for this has been firmly established and agreed with **the Headteacher**. If there are exceptional circumstances (e.g. familial connections or friendships between the employee's children and the pupil) then the Headteacher must be made aware. The situation must be carefully risk assessed.

27. Pupils in distress

27.1 There may be occasions when a distressed pupil needs comfort and reassurance. Staff should always remain self-aware, ensuring that their contact is non-threatening, intrusive or subject to misinterpretation.

27.2 Where a situation gives rise to concern, staff should always tell a colleague when and how they offered comfort to a distressed pupil and make a record of the incident. A record should be made on CPOMS.

28. Sharing concerns and recording incidents

28.1 All staff should be aware of the school's child protection procedures and procedures for dealing with allegations against members of staff. Staff who are subject to allegations are advised to contact their professional association.

28.2 In the event of any allegation being made, information should be clearly and promptly recorded and reported to a senior manager without delay in line with the Emmaus CAT Safeguarding and Child Protection Policy requirements.

28.3 In cases where a pupil develops and infatuation, there is a high risk of words or actions being misinterpreted and for allegations to be made against staff. Staff should report to a senior manager immediately any concerns that a pupil may be infatuated with them.

Appendix 1 – extract from Teachers' Standards Part Two: Personal and professional conduct

A teacher is expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout a teacher's career. Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by: • treating pupils with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position

• having regard for the need to safeguard pupils' well-being, in accordance with statutory provisions

• showing tolerance of and respect for the rights of others

• not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs

• ensuring that personal beliefs are not expressed in ways which exploit pupils' vulnerability or might lead them to break the law. Teachers must have proper and professional regard for the ethos, policies, and practices of the school in which they teach and maintain high standards in their own attendance and punctuality. Teachers must understand, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

Appendix 4

EXEMPLAR CODE OF CONDUCT FOR VISITORS

Before allowing visitors into the school, staff must ensure that the identity of any visitor has been confirmed by checking of photo ID badges or otherwise checking with an appropriate person or organisation (e.g. contacting the company head office, parent or member of staff expecting the visitor, if that visitor is already known to them).

All visitors must be issued with a Visitor Badge, and their attention must be drawn to any health and safety information.

Visitors may be unaccompanied only if the school has previously received confirmation from their employing organisation that they have had a DBS check, and the school is willing for that person to be in the school unaccompanied. They will receive the correct colour coded lanyard/visitor badge.

It is good practice for all visitors to receive a colour coded visitor lanyard. Visitors who do not have the relevant clearance must not be left unaccompanied at any time in areas where children are present.

All contractors carrying out work in the school should be met and a site induction carried out by the Site Manager or Business Manager before work commences.

Introduction

The purpose of this guidance is to safeguard all pupils, teachers, support staff, governors, parents, visitors and on-site contractors while they are on the school premises. The aim is to ensure that pupils, teachers, support staff, governors, parents, visitors and onsite contractors can enjoy an environment where they are safe from harm.

The guidance applies to:

- All teaching and support staff employed at the school.
- All external visitors entering the school site during the school day or for after school activities (including peripatetic tutors).
- All parents.
- All pupils.
- Building maintenance contractors.

Visitors Invited to the school

Before a visitor is invited to the school consideration should be given to the purpose of their visit, risks posed to children and appropriate authorisation sought where required. Staff will provide details of visitors to the main office.

Consideration must be made when inviting external speakers to the school, to ensure that the content of what is being delivered is in keeping with the values and ethos of Emmaus CAT.

Maintenance contractors will primarily be engaged to work during out of school hours. They must meet with the Site Manager or Business Manager when they arrive on site. Contractors should also supply a copy of their insurance documents prior to commencement of work. All contractors carrying out emergency work during term time will be accompanied by site staff at all times.

Visitors must report to the main school reception first. They must not enter the school via any other entrance. This will include excluded or suspended pupils who are escorted by staff when on site. Directions to the school reception should be clearly signposted at all entrances to the school.

At reception, all visitors must report to a member of reception staff and state the purpose of their visit and who has invited them. This will be verified by the receiving member of staff. The receiving member of staff must ensure that they have confirmed the identity of the visitor. For example, for a contractor, the receptionist will confirm identity via a company ID badge, or by ringing the company head office. If the visitor is a member of a pupil's family who is unknown to the office, their identity should be verified by the parent of the pupil.

All visitors are required to sign the Visitors Record Book or electronic sign in systems located in reception. Vehicle registration numbers must be logged.

All visitors, including contractors will be required to wear an identification badge. Colour coded lanyards should be given to members of the public and other visitors. Only regular, checked and vetted visitors will be given a lanyard which indicates a suitability to be in school unaccompanied.

Visitors must be escorted to their point of contact by a member of staff (if prior notice of the visit has been received), OR their point of contact will be asked to come to reception to receive their visitor (if the visitor is unexpected).

If the fire alarm sounds all staff must immediately escort their visitors to the evacuation assembly point.

Visitor health and safety information

- As a visitor you have a legal responsibility to care for the health and safety of yourself and others.
- Any accidents, near misses or defects you observe must be reported to the school office.
- The school operates a no smoking or vaping policy.
- If the fire alarm should sound, leave the building by the nearest exit and proceed to the designated assembly point.
- Should you discover a fire, operate the nearest alarm, and follow the exit procedure above.

On departing the school, visitors should leave via the main school reception and:

- Enter their departure time in the Visitors Book alongside their arrival/entry.
- Return identification badge to reception staff.

Unknown/uninvited visitors to the school

Any visitor to the school site who is not wearing a school visitor badge should be challenged politely to enquire who they are and their business on the school site. They should then be escorted to the main school reception to sign the Visitor's Book and be issued with an identity badge where appropriate. The above procedures then apply.

In the event that the visitor refuses to comply, they should be asked to leave the site immediately and the Headteacher and DSL should be informed promptly. They will consider the situation and decide if it is necessary to inform the police and initiate the school lockdown procedures.

Parent helpers/volunteer staff and governors

All parent/helpers, volunteers and Governors should comply with DBS procedures, completing a disclosure form when requested to do so. DBS checks for volunteers are free of charge. New helpers will be asked to comply with this policy by the member of staff who they first report to when coming into the school for an activity or class supporting role. All volunteers who are regular visitors to the school should receive appropriate safeguarding induction training.

Contractors

Contractors include people engaged to perform work who are not directly employed by the school. In many instances work processes will be carried out near classrooms, playgrounds or other areas occupied by pupils or staff while the school is in operation.

It is important that good lines of communication between the school and contractor are established before work commences to ensure that health and safety issues and supervision are appropriately managed.

Appropriate supervision is deemed to be where the work is either in an area which is constantly supervised or within sight of a member of the school's workforce, or where the work being carried out is physically cut off from the children by means of closed doors, fencing or gates. There should be no opportunity for children/young people to engage in conversation with a contractor without being observed by another member of staff.

All contractors should be issued with a code of conduct and the school's safeguarding procedures.

If school staff are concerned with inappropriate activities being undertaken these should be raised immediately with the DSL who will liaise with the Headteacher and contractor.

The School Site Manager is responsible for ensuring that a site induction, including information about safeguarding, is shared with contractors who visit the site. The site manager must communicate the impact of any work being undertaken to relevant members of the school community.

APPENDIX 5

Exemplar Policy for

Educational Visits

Introduction

..... School aims to offer a broad and balanced range of exciting and stimulating educational visits. The opportunities have a positive impact on raising standards, being a valuable and important part of the learning process for pupils of all ages.

They serve to:

- Bring breadth to the learning experience
- Stimulate enquiry
- Encourage tolerance and quality in relationships between all involved
- Extend, enlighten and enrich the curriculum and the pupils' learning experience

Residential courses should further self-discipline, organisation, empathy and recognition of our interdependence.

..... School is committed to providing all pupils as far as possible, including those with special needs, with at least one residential experience.

.....School has a longstanding reputation for the extra-curricular and residential opportunities offered and all students are encouraged to take advantage of these enriching experiences. All members of the school community (pupils, staff, parents and governors) have a right to be informed of the opportunities available and should anticipate a broad, balanced and exciting offer. Students will not be barred on financial grounds from any courses/visits considered a necessary part of the curriculum. When additional funding is necessary, the school will endeavour to source appropriate funds.

Visits should be consistent with the aims of the school and be fully researched, approved, clearly targeted and reviewed.

Visits can lead to financial pressure on parents and carers and cause stress for both staff and pupils. All visits should follow an agreed pattern, to be part of the overall academic planning cycle, that can ensure smooth running of any event/activity and minimise risk.

The scope of this policy covers a range of potential activities, whether a short trip to a local museum or travelling long distances for a specific activity at a specially selected location. The same principles will also be applied to those types of visits that are purely for enjoyment and enhancement of life experiences, such as swimming and sporting activities. The benefit for pupils visiting venues and gaining first-hand experience and/or partaking in activities is invaluable in their educational and personal development.

We also recognise that the selection of appropriate venues that can enhance the experience and enjoyment without compromising the health and safety of those who are involved, are crucial to the success of the visit. Equally crucial in the success of educational visits is the need to involve parents and carers and to gain from their support and enthusiasm.

The purpose of this policy is to therefore ensure that all educational visits, irrespective of their nature and duration, are well planned and co-ordinated and take into account the health and safety issues that may foreseeably arise during any visit.

RESPONSIBLE PERSON

All schools should have an Educational Visits Co-Ordinator. In this school that person is .....

- The primary functions of the above-named person are to co-ordinate and oversee all issues and controls regarding educational visits and to liaise between all appropriate parties during the planning and organisation.
- This includes the need to ensure that the requirements of this policy are carried out and that any problems or difficulties in meeting these requirements are reported.
- In particular, the above-named person has responsibility for ensuring that any systems and procedures laid down for dealing with educational visits and the selection of suitable persons and organisations involved, follow the principal requirements of this policy and are fully in place prior to the commencement of any educational visit.
- In addition, the above-named person is responsible for ensuring that feedback is obtained from all educational visits and utilised, where practicable, to both enhance and improve any future arrangements and selection processes.

The above person can delegate specific tasks to other staff members and is responsible for ensuring that such delegation is appropriate and clearly understood.

Aims

- To ensure that the purpose of any educational visit is clearly understood and is the focal point for any arrangements made.
- To ensure that all visits have prior approval before going ahead.
- To not exclude any pupil with protected characteristics as defined by the Equality Act (2010).
- To ensure adequate provisions and arrangements have been included for all pupils with special needs during educational visits.
- To categorise each educational visit and to plan and organise accordingly. (Note: visit categories are summarised at the end of this policy document.).
- To co-ordinate all educational visits through our appointed Educational Visits Co-Ordinator (EVC).
- To ensure a suitable Trip Leader is appointed for each type of visit, irrespective of the nature and duration.
- To ensure that any selected Trip Leader has the relevant qualifications (where appropriate), skills, experience and abilities suitable for the responsibilities placed upon them.
- To select only appropriate venues and locations that are well-known and/or have been adequately assessed beforehand.
- To select only competent persons for supervisory roles and to ensure they have been suitably vetted and cleared in line with the school's safeguarding procedures.
- To select only competent and assessed travel and/or tour operators for means of transportation to and from venues and locations.
- To arrange educational visits only where the risks have been assessed and reduced to as low as reasonably practicable beforehand.
- To provide effective levels of supervision at all times appropriate to the numbers and age group(s) of the pupils.

- To ensure that all parents are fully informed of any plan to organise an educational visit and that formal consent has been obtained beforehand.
- To assist, wherever possible, those parents who may have difficulties in meeting all the costs of any specific visit.
- To be inclusive all pupils wherever practicable, to be mindful of those whose personal circumstances represent a threat to the health and safety of themselves and others. It is the right of the school to review an individual's position on the visit if this is the case.
- To ensure that trips have compulsory trips/fieldwork as a statutory part of the course have staff cover costs supported by whole school.
- To ensure all trips and visits are uploaded onto the Evolve online system

The Arrangements

The following arrangements and activities are in place in order to meet the above policy requirements:

- A comprehensive risk assessment process to identify risks to the health and safety of all those who attend an educational visit and to determine the necessary precautions required to adequately control the risks.
- A set of procedures to be followed in the event of an emergency or any unpredicted event that may threaten the health and safety of anyone during the visit.
- A reporting procedure for any accidents or incidents that may occur on the educational visit and for observed conditions that may lead to such incidents.
- A system for providing feedback on the experiences of all educational visits that enables improvements and enhancements of future visits to be considered.
- First aid provision and trained first aiders appropriate to the assessed needs of any educational visit (all trips must have first aid cover).
- Adequate insurance arrangements appropriate to the nature of the visit covering (where appropriate):
- Luggage and equipment
- Accident and medical cover
- Cancellation
- Provision of relevant, more detailed and updated internal guidelines, checklists and procedures to ensure a safe and successful visit.
- Checklist systems to ensure the following are accounted for:
- Names of all students on the visit and accountability during the visit
- Emergency contact details of parents
- A list of provisions and equipment required for the visit, including specific medical and first aid provisions
- Itineraries and schedules for all proposed travel and activities
- Appropriate and adequate provision of information (Medical, SEND or behavioural) and instructions to all those who require them
- Appropriate mobile communication methods, systems and equipment
- Additional specific requirements based on the nature and location of the visit
- The assessment and provision of a licensed transport provider and adequately maintained transport vehicles wherever and whenever required.

- The assessment of appropriate modes of travel and provisions for alternative arrangements in the event of an emergency

Responsibilities Trip Leader

- Where so instructed and delegated by the responsible person named in this policy, to plan the proposed visit considering the health and safety risks that may arise before, during and after the visit.
- To appoint, where considered appropriate, any competent deputy or deputies in support of any visit.
- Ensure relevant information is obtained on any proposed visit, Inc. programme, ongoing profile of pupil needs, and the venue to enable an appropriate risk assessment to be carried out. (Staff cannot be responsible and not liable for a known historical medical condition if information is withheld from the trip leader prior to the visit.)
- To ensure that the needs of all those included on the visit are assessed and provided for.
- To ensure that the risk assessment(s) also determine the appropriate level of supervision, first aiders and any other specifically trained and/or experienced personnel.
- Ensuring that all equipment and materials required for the visit are adequate and arrangements are made to store them safely and correctly.
- To ensure parents are provided with all the necessary information about the educational visit, any equipment etc. they need to provide and the standards of conduct expected of their child(ren).
- Where appropriate, invite parents/carers to any briefing sessions. This should take account of any difficulties that parents may have if they have disabilities, if English is their second language etc.
- To brief all group members, including pupils and parents, on the main elements of the visit, the standards expected and the roles and responsibilities of all prior to commencing the visit.
- To finalise all details and arrangements with the responsible person named in this policy.
- To explain school Code of Conduct and any other relevant rules related to that activity.
- To ensure that staff have capacity to lead at all times.

Teaching staff involved with educational visits

- Support the Trip Leader in all requirements and follow instructions.
- Look out for the health and safety of themselves and those around them and for whom they also have appointed responsibility. Be aware of the risks and controls.
- Assist in general control and discipline requirements.
- Inform the Trip Leader of any concerns, observed or otherwise.
- Do not to force pupils to partake in any activities during the visit that they may not wish to do.
- All expressions of interest for a trip should be submitted in writing four weeks in advance to the governing body.

Parents/Carers

- Must provide emergency contact details prior to the educational visit.
- Sign and return a consent form.
- Provide any relevant information known to them regarding the (current) health of their child and if necessary, complete an Individual Healthcare Plan (IHP) and/or Administration of Medicine Form. (Staff cannot be responsible for any history that is not disclosed)
- To disclose any specific details of concerns for their child that may be appropriate to the nature of the visit and any activities planned. Update staff if medical conditions/needs change.

Students

- Must dress and behave sensibly and strive to meet the expectations placed upon them.
- Must follow the instructions given to them by any accompanying adults.
- Must not take any unnecessary risks or place other pupils at unnecessary risk. Staff and pupils must report to any supervising adult any concerns they may have during the visit and, in particular, if and when they are asked to partake in any activities.

Training

The following training will be undertaken:

- All staff will be made fully aware of this policy and the requirements and arrangements laid down within it.
- All staff will be trained in understanding the health and safety requirements of educational visits, particularly in relation to those identified in the relevant risk assessments.
- Key staff, as identified by the responsible person named at the head of this policy document, will be trained in any specific role they are required to take in support of this policy.

Summary of educational visit categories:

Category A: Regular visits to venues within the locality that are well-known and of low, assessed risk.

Category B: A visit to a venue that may require significant travel outside the locality and/or may be a rarely visited venue but is still assessed as low risk.

Category C: Any type of visit in the UK that requires residential accommodation for one or more nights.

Or visits abroad that require residential accommodation for one or more nights.

Or high-risk activities.

Examples of high-risk activities:

- All action adventure activities
- Field work
- Theme parks
- Activities involving water sports, ski-ing etc

Accountability

The Educational Visit Co-ordinator (EVC)

The EVC ensures that educational visits follow National, Local Authority (LA) and School policies ensuring that all aspects of the 2010 guidelines (section 3.4j) are complied with and that the Trip Leader and accompanying adults are suitably competent to run the visit.

Trip and Activity Leaders

Those formally appointing a designated Trip or Activity Leader should take account of the following:

- Trip/Activity Leader should be formally approved for the event-specific activity
- Trip/Activity Leader **must** be formally assessed as being competent
- Ensure that those leading visits have appropriate understanding of employer guidance. It is good practice for employers to provide formally accredited Trip Leader training.

New Staff will be required to attend Trip Leader training/arrange formal induction with the EVC before they can lead a visit.

- The officially approved and designated Trip/Activity Leader should be: Accountable (being accountable implies being an employee, or legally contracted - and thus part of a chain of specified roles and responsibilities.
- Competent/Confident (a leader who is not confident may not be effective). Competence requires that the leader can **demonstrate the ability to operate to current standards of recognised good practice** and the following indicators of competence should be in place:

Appropriate knowledge and understanding of:

- LA guidance reinforced by formal training
- School procedures reinforced by the Educational Visits Policy
- The group, the staff, the activity and the venue; recent and relevant experience; in some cases, a formally accredited qualification e.g. first aid, adventure activities leadership/coaching award

Where a Trip Leader or Assistant Leader plans to provide their own **adventurous activities** to children and/or young people, it is a recommended that competence is externally and credibly verified.

This can be achieved by:

- holding a current NGB leadership award (or equivalent)
- **or,** if working in an outdoor centre, through a "signing off" process by an Employer-approved technical adviser
- A Trip/Activity Leader **must** follow Employer guidance and school policy and procedures
- A Trip /Activity Leader **must** ensure that the activity is properly planned and that the plan includes appropriate risk management procedures based on a risk-benefit analysis

Appendix 6

School Local Information

School	Headteacher	DSL	DDSL	LA	CSC Contact	LADO	Link to LA policy
St Winifred's RC Primary School	Alicia Duffy	Alicia Duffy	Mrs H Bird	Stockport	0161 217 6028	Contact the LADO - Stockport Council	https://greatermanchesterscp.trixonline.co.uk/

School Governance

School	Chair of Governors	Lead Governor for Safeguarding
St Winifred's RC Primary School	Clare Downing	