



Academy Policy

Safeguarding and Child Protection Policy

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Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
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Local authority designated officer (LADO)	Caroline Hose	0115 876 4762 LADO@nottinghamcity.gov.uk
Board of Trustees Chairperson	Eileen Hartley	0115 855 0100
Named Safeguarding Trustee	Emma Ogden	0115 8550100 Claire.beardsall@raleightrust.org
Safeguarding Governor	Adrian Armstrong	0115 9155734

Channel helpline Nottingham City Social Care	020 7340 7264 0115 876 4800 or email: candfdirect@nottinghamcity.gov.uk
Local authority school education coordinator	0115 8764749 Claire.Maclean@nottinghamcity.gov.uk
Local authority Prevent officer	Louise Cox Louise.cox@nottinghamcity.gov.uk 01158765864

1. Context

- 1.1. Woodlands Academy is a special school in the Raleigh Education Trust providing education for pupils with a wide range of special educational needs and disabilities.
- 1.2. All pupils at Woodlands Academy either have an Education Health Care Plan (EHCP), or as part of an assessment process. All admissions are in agreement with the Nottingham City SEN Team and based upon the academy's ability to meet need.
- 1.3. Pupils follow one of three learning pathways:
 - a. Yellow Curriculum
 - b. Green Curriculum
 - c. Blue Curriculum
- 1.4. The yellow curriculum supports pupils with the most significant learning needs. This young people have needs including ASD, PMLD, Speech and language and communication difficulties. Yellow curriculum aims to develop the pupil's independence and communication.
- 1.5. The green curriculum supports pupils with significant educational needs who are also able to engage in some formal learning. These young people have needs including ASD, SEMH, MLD, SLD, speech, language and communication. The green curriculum aims to develop literacy and numeracy skills, along with independence and communication. Pupils work towards Entry Level and Unit Award accreditations.
- 1.6. The green curriculum supports pupils with needs including ASD, MLD, SEML and ADHD. These young people can access a more traditional curriculum. The green curriculum aims to work towards independence and accredited qualifications at Level 1 and 2 (GCSE, BTEC, Entry Level).
- 1.7. Woodlands Academy will also use alternative provision, when required, to offer bespoke programmes of education to meet the needs of identified pupils.

2. Aims

- 2.1. Our Academy is committed to safeguarding and promoting the welfare of children and young people and we expect all staff and volunteers to share this commitment. Creating a culture of safety and vigilance for our pupils is of paramount importance, we aim to:
 - a. create and maintain a safe environment.
 - b. manage situations should child welfare concerns arise.
 - c. create an atmosphere of trust in which pupils feel confident to confide any concern.
 - d. help young people to understand the difference between acceptable and non - acceptable behaviour.
 - e. teach pupils to stay safe from harm.
- 2.2. Pupils are taught about safeguarding, including E-safety as part of a broad and balanced curriculum. All

staff within the academy take welfare concerns seriously and encourage children and young people to talk about anything that worries them.

3. Legislation and statutory guidance

- 3.1. This policy is based on the Department for Education’s statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#), the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
- 3.2. This policy is also based on the following legislation:
- a. Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
 - b. [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
 - c. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police when they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
 - d. [Statutory guidance on FGM](#), which sets out responsibilities concerning safeguarding and supporting girls affected by FGM.
 - e. [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
 - f. Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children.
 - g. [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
 - h. The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children.
 - j. [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
 - k. [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and principal should carefully consider how they are supporting

their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- I. [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.
- 3.3. This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2)<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>
- 3.4. This policy also complies with the Nottingham City Safeguarding Children Partnership:
<https://www.nottinghamcity.gov.uk/information-for-residents/children>
[https://www.nottinghamcity.gov.uk/information-for-residents/children-and_families/nottingham-city-safeguarding-children-board/andfamilies/nottingham-city-safeguarding-children-board/](https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/andfamilies/nottingham-city-safeguarding-children-board/)

4. Definitions

- 4.1. Safeguarding and promoting the welfare of children means:
 - a. Protecting children from maltreatment
 - b. Preventing impairment of children's mental and physical health or development
 - c. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
 - d. Taking action to enable all children to have the best outcomes.
- 4.2. **Child protection** is part of this definition and refers to activities undertaken to prevent children from suffering, or being likely to suffer, harm or significant harm.
- 4.3. **Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- 4.4. **Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
- 4.5. **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
- 4.6. **Children** include everyone under the age of 18.

- 4.7. **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- 4.8. **Alleged perpetrator(s) and perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and what terms to use on a case-by-case basis.
- 4.9. The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
- a. The local authority (LA)
 - b. Integrated care boards (previously known as clinical commissioning group) for an area within the LA.
 - c. The chief officer of police for a police area in the LA area.
- 4.10. Designated Safeguarding Lead (DSL) – this term is referred to throughout the policy and refers to either the Senior or Deputy DSL in the absence of the DSL.

5. Equality Statement

- 5.1. Some children have an increased risk of abuse, both online and offline and additional barriers can exist for some children with respect to recognising or disclosing concerns. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.
- 5.2. We give special consideration to children who:
- a. Have special educational needs (SEN) or disabilities (see section 10)
 - b. Are young carers
 - c. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
 - d. Have English as an additional language
 - e. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
 - f. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
 - g. Are asylum seekers

- h. Are at risk due to either their own or a family member's mental health needs.
- i. Are looked after or previously looked after (see section 15)
- j. Are missing or absent from education for prolonged periods and/or repeat occasions.
- k. Whose parent/carer has expressed an intention to remove them from school to be home educated. Local authorities will review the plan and work closely with parents/carers.

6. Roles and responsibilities

- 6.1. Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 Safeguarding Partners:
 - a. Nottingham City Council children's safeguarding board and children's social care
 - b. Nottinghamshire Police
 - c. Nottingham City Clinical Commissioning Group (Health)
- 6.2. The three safeguarding partners have a shared and equal duty to work together and promote the welfare of children.
- 6.3. Our policy and procedures also apply to extended school and off-site activities. The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, transphobia, biphobia and sexual violence/harassment. This will be underpinned by our:
 - a. Relationships & Positive Behaviour Policy
 - b. Pastoral support
 - c. PSHE/RSE curriculum, which is delivered regularly and tackling issues such as.
 - i. healthy and respectful relationships
 - ii. boundaries and consent
 - iii. stereotyping, prejudice, and equality
 - iv. body confidence and self-esteem
 - v. how to recognise an abusive relationship (including coercive and controlling behaviour)
 - vi. the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support.
 - vii. what constitutes sexual harassment and sexual violence and why they're always unacceptable.

6.4. Education, support, and guidance is delivered through our school curriculum, well-being team and external links:

- a. Mental health support team- Attend school regularly and offer support through 1-1, small groups, class groups and assemblies.
- b. Jigsaw PHSE scheme – The scheme of work can be found in the Trusts Relationships Education, Relationships and sex Education (RSE) and Health Education Policy. PHSE sessions are delivered by the class tutor weekly.
- c. Police intervention officer - Attends school regularly to support with specific cases. Workshops to support trending behaviours and inform learners regarding the law around such behaviours.
- d. Youth justice service – Will attend school when a learner has been referred to their service.
- e. ELSA support – Delivered by trained staff on a 1-1 session or small groups to support emotional well-being, resilience, and self-esteem.
- f. Wellbeing session – These sessions are used to support learners who require immediate and ongoing support with their mental health and well-being.

6.5. All staff, including supply staff that are considered long-term will:

- a. Read and understand part 1 and annex B of the Department for Education’s statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- b. Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- c. Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g., sites they need to visit or who they’ll be interacting with online)
- d. Provide a safe space for pupils who are LGBT to speak out and share their concerns. The Academy has safe spaces that all pupils have access to. Pupils are encouraged to name their preferred safe space, and this is recorded on their pupil profile so that all staff are aware of this. Pupils where appropriate are encouraged to name their trusted adults who they feel comfortable with and who they feel can support them in times of distress or dysregulation. Pupils who identify as LGBT are supported by ELSA (Emotional Literacy Support Assistant), a well-being mentor and/or the safeguarding team who actively promote their mental health and well-being if required. This can be ad-hock support sessions or planned ones in school. School can make a referral to an outside agency such as MHST to support the child and their family when a pupil may be struggling with their thoughts and feelings around identity.
- e. For further information please refer to our Trust Relationships and Sex Education (RSE) policy [Raleigh Education Trust Policies \(raleightrust.org\)](https://raleightrust.org).

6.6. All staff will be aware of:

- a. Systems and procedures that support safeguarding, including this policy, the trust’s Relationships and positive behaviour policy, the academy’s behaviour guidance and online safety policy (which includes

the expectations, applicable roles, and responsibilities in relation to filtering and monitoring), the staff code of conduct, the identity/role of the designated safeguarding lead (DSL) and DSL teams, and the necessary safeguarding response to children who go missing from education (CME).

- b. Staff receive annual child protection and safeguarding update training, Prevent training, annual harmful sexual behaviour and any other relevant training including the whistleblowing policy, which enhances staffs understanding of keeping children safe and contextual training to meet the needs of the school including how to take action if they are concerned.
- c. Information regarding children missing from education can be found in the Trust attendance policy on our Trust website.
- d. The early help process and their individual and team role, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- e. The process for making referrals to the local authority children’s social care and for statutory Reassessments that may follow a referral, including the role they might be expected to play.
- f. What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- g. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.
- h. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- i. The fact that children can be at risk of harm inside and outside of their home, at school and online.
- j. The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children.
- k. What to look for to identify children who need help or protection
- l. If our pupils have an alternative curriculum offer, we ensure that the Alternative provision has regular communication with the academy, providing information on incidents and any actions taken, or to seek advice. The Trust AP Lead completes annual safeguarding checks on providers and there is a robust quality assurance programme in place throughout the year. All Alternative Providers are also part of Nottingham City QA process. The attendance of the pupils in AP is taken daily by the Trust Attendance team. They also conduct safe and well checks in line with policy.

6.7. The Designated Safeguarding Lead (DSL)

6.7.1 The DSL is a member of the senior leadership team and takes lead responsibility for child protection and wider safeguarding. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. The academy uses Smoothwall as a filter. (Appendix 5) Alerts are sent to leaders to monitor school devices and school networks. This is broken down into

tiers of alerts that includes instant response and weekly reporting for the DSL to respond accordingly. Leaders will provide an overview of filtering and monitoring processes to governance. Please see 'Important contacts' (page 1) for each academy's Safeguarding Team.

- i. If for any reason a DSL cannot be contacted, staff must contact an academy senior leader or the Trust Safeguarding Lead, (see important contacts).
- ii. The DSL (senior/deputy) will be given the time, funding, training, resources, and support to:
 - a. Be the first point of contact for staff concerning child welfare and child protection matters.
 - b. Be aware of pupils who have a social worker.
 - c. Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues with teachers and school leadership staff.
 - d. Provide advice and support to other staff on child welfare and child protection matters, including delivering staff annual training and termly updates.
 - e. Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
 - f. Contribute to the assessment of children.
 - g. Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
 - h. Be familiar with the communication books used in school. They also have access to imprint allowing personalised questions to be typed to support questioning using picture communication.
 - i. Be aware of pupils who are non-verbal or have speech and language difficulties and how the school would support the pupils with these needs. A DSL would ask a familiar member of staff to be present to support the child with communication. Examples of how to communicate with these learners:
 - a. Use of Makaton
 - b. Use of signs and symbols
 - c. Use of electronic communication device
 - d. Use of signs of safety, what's working well, what are you worried about?
- j. Record, monitor and track referrals.
- k. Complete safeguarding induction e.g. agency staff, including obtaining safer recruitment information for the SCR, if appropriate.

- l. Complete regular quality assurance checks on records and referrals (Dip Test). The DSL chairs weekly inclusion and safeguarding meetings to discuss cases and monitor referrals.
- m. Ensure that child protection information is transferred to the pupil's new school. LA recommendation is within 5 working days once a new placement has been confirmed.
- n. If the file is electronic a DSL will transfer to the new school once a placement is confirmed. If the file is paper-based the school office would send it along with other school records by recorded post or deliver it in person. Receipts are signed, dated, and kept on file.
- o. Ensuring risk assessments put in place for pupils are recorded on our safeguarding electronic system. Ensure that information on the risk assessment is shared with the relevant staff. Woodlands uses a generic risk assessment adapted to the behavioural risk such as:
 - i. Harmful Sexual behaviour
 - ii. Risk-taking behaviour
 - iii. We have a specific risk assessment for a knife/blade.
- p. All Information/RA are shared with alternative providers at referral.
- q. Have a good understanding of harmful sexual behaviour through annual update training.
- r. To liaise with the Trust safeguarding Lead as necessary for support, advice, and supervision
- s. To oversee the completion of the annual safeguarding checklist for an offsite provider or obtain an updated checklist from the Trust AP lead.
- t. Maintain a vulnerable pupil list and record which agency are working with each pupil.

6.7.2 The DSL will also

- a. Keep the Principal (if they are not the DSL) informed of any issues. The Academy has a weekly meeting with the Trust Attendance & Welfare Team, Principal, Senior and Deputy DSLs to discuss attendance and safeguarding concerns and/or provide any updates. Minutes and actions from the meeting are taken and kept on our electronic recording system.
- b. Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- c. Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to support the development of academy and trust policies and attend multi-agency network meetings. The academy's Police Intervention Officer delivers a series of workshops throughout the academic year. This also includes support with individual cases. The academy will support individual pupils via its ELSA (Emotional Literacy Support Assistants), if appropriate.
- d. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support. Referrals can also be made to outside agency

by a consenting parent including IMARA and Nottingham sexual violence services.

- e. Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search – PACE Code C2029.
- f. Seek advice/guidance from the Trust Safeguarding Lead
- g. Have a good understanding of the filtering and monitoring systems and processes in place at our school.

6.7.3 The full responsibilities of the DSL and deputies are within the job descriptions for the role.

6.8. Local Governing Body

- 6.8.1 All Governors have an enhanced DBS which is recorded on the single central record (SCR) and 128 management checks are carried out and recorded. The Chair of Trustees has an enhanced DBS which is countersigned by the Secretary of State.
- 6.8.2 Governors have a key responsibility for monitoring safeguarding and child protection across the Academy.
Monitoring takes place termly:
 - a. Head teachers report, which includes safeguarding is delivered to governors at the termly governors' meetings.
 - b. Safeguarding audit
 - c. Trust safeguarding report.
- 6.8.3 Responsibilities include:
 - a. To ensure a child protection /safeguarding policy is in place.
 - b. To ensure procedures are in place for dealing with allegations against a member of staff not just within the school setting but also staff's conduct outside the school setting which is known as the 'harm' test. This is concerning a person's conduct outside the school and need not include a child, for example, domestic abuse of a partner.
 - c. To ensure appropriate staff training is in place, including online safety training and that it is updated regularly and is in line with advice from the safeguarding partners.
 - d. Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - i. Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - ii. Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

- e. To ensure there is a member of the Local Governing Body who is responsible for and has been trained for safeguarding, child protection and safer recruitment.
- f. To ensure policies and procedures in the academy are reviewed annually, or earlier where necessary. This is reviewed through the:
 - i. Annual safeguarding audit, Trust SG lead reports findings to Safeguarding Trustee
 - ii. Headteachers reports to LGB.
 - iii. Actions from the audit and required actions are shared with the safeguarding trustee. All policies are scrutinised and ratified by the governance.

6.8.4 They will also make sure:

- a. The DSL has the appropriate status and authority to carry out the job effectively.
- b. The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- c. Online safety is a running and interrelated theme within the whole-academy approach to safeguarding and related policies:
 - i. How to keep yourself safe online is delivered as part of the ICT curriculum throughout the academic year.
 - ii. Pupils are not allowed to keep their mobile phones with them whilst in school. Staff collect phones on arrival and keep them for safe keeping until the end of the day.
 - iii. Workshop sessions delivered by the school police intervention officer.
 - iv. Staff have regular update online training to support online safety.
 - v. Information is shared with parent/carers to encourage online safety at home. This is shared through leaflets, emails, and the school website.
 - vi. Senior Leaders and the DSL are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
 - vii. IT company Flywheel IT services – Tel 01905788023 helpdesk@flywheel-it.co.uk.
 - viii. Our academy has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers, and contractors).
 - ix. That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised. Some staff are trained to use Makaton, signs and symbols or an electric device with communication software to communicate with our learners that are non-verbal or have speech and

language difficulties.

- x. The Senior DSL has effective ways of communicating with pupils and this is shared with the safeguarding team. Outside agencies may be called upon to provide additional bespoke training and information sharing concerning specific pupils.
 - xi. Where school engages in services or activities, regardless of whether the children attend these services/activities or not we:
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place if required.
 - All visiting staff who have either supervised or unsupervised regular access to pupils require an enhanced DBS check from their company. These checks are kept on file and reviewed annually if the service is still in place.
 - Make sure there are arrangements for the body to liaise with the academy about safeguarding arrangements, where appropriate. about safeguarding arrangements, where appropriate.
 - Make sure that safeguarding requirements are a condition of using the academy premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
 - d. Safeguarding governor will undertake safeguarding training that equips them with the knowledge to effectively support the delivery of a robust whole school approach to safeguarding.
- iii. Online TES - Governance of Safeguarding
 - iv. The Prevent Duty – online training
 - v. Confederation of school Trusts, Strategic safeguarding for schools.

6.9 Trust Safeguarding Lead

- 6.9.1 The Trust Safeguarding Lead will offer support and challenge, concerning all safeguarding matters. Through half termly quality assurance, they will ensure all processes and procedures operate to a high standard across all the academies within the Trust. They will update academy principal's half termly in support of the Head teachers report to the local governing body.
- 6.9.2 The safeguarding Lead is responsible for:
- a. To support and advise on a safeguarding training programme in partnership with the academies.
 - b. To work collaboratively with colleagues offering support and guidance.
 - c. To ensure the Safeguarding policy is updated in line with guidance and statutory policies.

- d. To quality assure all records and referrals to external agencies.
- e. To complete annual safeguarding audits are completed and shared with the appropriate stakeholders, including the Safeguarding Trustee.
- f. To support the Academy Principals with allegations against staff and attending any relevant meetings.
- g. To chair the Trust Safeguarding Network meeting
- h. To ensure all relevant safeguarding updates and best practices are shared within the Trust via the Safeguarding Network Meetings.
- i. To be aware of any pupils who are at a critical stage of their CP plan.
- j. To provide advice to stakeholders concerning welfare, safeguarding and child protection issues.
- k. To meet with the Safeguarding Trustee annually
- l. To provide regular updates to the Central Executive team
- m. To oversee the Single Central Record across the academy sites
- n. To work alongside the Trust Data Protection Officer with regards to Subject Access Requests with a safeguarding nature.

6.10 The Principal

6.10.1 The Principal is responsible for the implementation of this policy, including:

- a. Ensuring that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction.
- b. Communicating this policy to parent/carers when their child joins the school and via the school website.
- c. Ensuring that the DSL has appropriate time, funding, training, and resources and that there is always adequate cover if the DSL is absent.
- d. Ensuring that all internal staff undertake appropriate safeguarding and child protection training and update this regularly. This must include online safety training and ensure staff have a clear understanding of the filtering and monitoring arrangements across the academy.
- e. Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- f. Ensuring the relevant staffing ratios are met, where applicable
- g. Making sure each child in the Early Years Foundation Stage is assigned a key person. Learners

have a named familiar person on their pupil profile. This is a person that has worked with the pupil and has a good understanding of how to communicate with them.

- h. Overseeing the safe use of technology, mobile phone and cameras in the setting.

6.11 Virtual school heads

- 6.11.1 Have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of pupils with a social worker. They should also identify and engage with key professionals, e.g., DSLs, SENCOs, social workers, mental health leads and others.

7 Confidentiality

- 7.1 Please see the Trust's Data Protection Policy

- 7.2 Personal information about all pupils' families is regarded by those who work in this School as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality:

- a. Staff understand that they need to know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The DSLs and Principals will disclose information about a pupil to other members of staff on a need-to-know basis only. It is inappropriate to provide all staff with detailed information about the pupil, incidents, the family, and the consequent actions.
- b. At Woodlands all staff operate within the information-sharing advice document 'Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many Serious Case Reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.'

[DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/dfe-non-statutory-information-sharing-advice-for-practitioners-providing-safeguarding-services-for-children-young-people-parents-and-carers.pdf)

8 Recognising abuse and taking action

- 8.1 All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:
 - a. Is disabled
 - b. Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
 - c. Is a young carer
 - d. Is bereaved
 - e. Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
 - f. Is frequently missing/goes missing from education, care or home
 - g. Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
 - h. Is at risk of being radicalised or exploited
 - i. Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

- j. Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- k. Is misusing drugs or alcohol
- l. Is suffering from mental ill health
- m. Has returned home to their family from care
- n. Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- o. Is a privately fostered child
- p. Has a parent or carer in custody or is affected by parental offending
- q. Is missing education, or persistently absent from school, or not in receipt of full-time education
- r. Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

8.3 Please note – in this and subsequent sections, you should take any references to the DSL to mean “the Senior/Deputy DSL or Safeguarding Team.”

9 If a child is suffering or likely to suffer harm, or in immediate danger.

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

9.2 Tell the DSL as soon as possible if you make a referral directly.

Multi Agency Safeguarding Hub (City MASH):

CityMash@nottinghamcity.gov.uk

GOV.UK webpage for reporting child abuse to your local council:

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

10 If a child makes a disclosure to you

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

- a. Listen to what the pupil is communicating to you. Allow them time to talk freely and do not ask leading questions.
- b. Stay calm and do not show that you are shocked or upset.
- c. Do not make personal comments e.g., if a pupil asks, “what do you think?”
- d. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- e. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- f. Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do

not put your own judgement on it.

Write-up and submit a concern report via the electronic safeguarding system, as soon as possible, ensure it is done before the end of the day, and by alerting the DSL (**STAFF MUST NOTIFY IMMEDIATELY THE DSL IN PERSON OF ANY CONCERNS WHERE A CHILD MAY BE AT RISK OF HARM; and BEFORE THEY GO HOME**).

- 10.2 The DSL of our alternative providers will adhere to our Safeguarding policy procedures, they will alert our DSL to any safeguarding concerns regarding our pupils either via our electronic reporting system (CPOMS) or by a phone call / email by the end of the day of the concern.
- 10.3 At Woodlands the DSL is automatically alerted to incidents which are recorded on CPOMS. The DSL and Deputy DSL will then work together. In cases where the same electronic recording system is not used, for example for pupils in alternative provision at other settings, Woodlands are made aware by either email or phone call. All Information is requested and transferred onto the school's electronic system by the DSL or Deputy DSL.

11 If you discover that FGM has taken place, or a pupil is at risk of FGM

- 11.1 The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs".
- 11.2 FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- 11.3 Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.
- 11.4 **Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally (with support from the DSL). This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- 11.5 Unless they have been specifically told not to disclose, involve children's social care as appropriate.
- 11.6 **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL, **immediately**.
- 11.7 The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- 11.8 **Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL, **immediately** and follow our local safeguarding procedures.

12. If you have concerns about a child, not at risk of immediate harm

- 12.1 Figure 1 (section 16) illustrates the procedure to follow if you have any concerns about a child's welfare.

- 12.2 Where possible, speak to the DSL first or the deputy DSL in their absence to agree on a course of action.
- 12.3 If in exceptional circumstances the DSL(s) are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- 12.4 Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share All safeguarding information is recorded onto CPOMS by a member of staff who have a concern.
- a. A clear and comprehensive summary of the concern
 - b. The DSL will review the concern and consider if the child is at risk of immediate harm or suspected of being at harm.
 - c. In most cases parent / carers are contacted first and the concern discussed, this would not happen if it was deemed it would put the child in danger.
 - d. Parents are asked for consent if a referral is the most appropriate response for the concern.
 - e. Consideration as to whether a risk assessment needs to be put into place.
 - f. In situation where there are concerns a child is suffering, or is likely to suffer significant harm, information may be shared with professionals without parent consent.
 - g. Details of how the concern was followed up and resolved.
 - h. All actions, decisions, interventions need to be recorded.

13. Early help

- 13.1 If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
- 13.2 The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
- 13.3 Procedures for early help may include:
- a. School based mental health support team (MHST) – Woodlands have a mental health support team worker that attends school regularly. They have a referral process but can offer low intensity CBT informed interventions for mild to moderate anxiety and low mood symptoms.
 - b. Emotional literacy support assistant (ELSA) – school trained staff. Sessions are normally on a weekly basis. ELSA allows the school to have the capacity to support the emotional needs of our pupils within our own resources. Pupils develop strategies to support the emotional responses and

resilience to situations. ELSA support is used to support learners who are finding it difficult to regulate their behaviour.

c. Emotional Wellbeing Mentor – school-based level 3 teaching assistants. Support learners, ad hock, daily or weekly.

d. Examples:

- Responsive support- there has been an incident in the home the night before and they are not in an emotional place to learn on arrival to school. Staff member will listen and support the learner to achieve the best possible outcome.
- Daily support – Pupil has suffered a bereavement. Staff member would meet daily to check learner wellbeing and offer advice if required. If the staff member had a concern, they would speak to the lead DSL.
- Weekly support – Daily support can change to weekly support once they do not need to see a member of staff every day.
- Pupils are struggling to maintain relationships in or out of school that is impacting on their emotional wellbeing.
- Group sessions to build confidence, resilience and friendship.
- Child Adolescent mental health service (CAMHS)– service requested through either a self-referral, health services or a school referral made by a DSL. CAMHS could support with concerns in relation to

- a. Depression
- b. Eating difficulties
- c. Self-harm
- d. Violence or anger
- e. Obsessions compulsive disorders
- f. Low self esteem
- g. Anxiety
- h. Sleep difficulties
- i. Identity
- j. Suicidal thoughts

- 13.4 Behaviour emotional mental health service (BEMHS) – service requested by a DSL when there is a concern regarding a pupil’s behaviour, emotional health and wellbeing and mental health and is displaying concerns in the following areas
- a. Challenging behaviour
 - b. Withdrawn and isolated
 - c. Truancy
- 13.5 MARF – referral made by a DSL. A request for services from the Local Authority. This request is made if school feel that there is a risk to a child. If a child is in immediate risk social care should be contacted before completing the online form.
- 13.6 Whole Life disability team- pupils who have an EHCP – Can support families with referrals for short breaks, home advice and signpost to other services.
- 13.7 Speech and Language Service for children who maybe struggling with communication.
- 13.8 Please see the academy’s DSL for more information.

14. Referral

- 14.1 If it is appropriate to refer the case to local authority children’s social care or the police, the DSL or deputy DSL in the DSL’s absence will make the referral. In the absence of a DSL /deputy advice from senior leaders or the Trust Safeguarding Lead must be sought if you do not feel confident to make the referral yourself. The senior leader or Trust Lead will support you with completing the referral.
- 14.2 If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.
- 14.3 The local authority should decide within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- 14.4 If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.
- 14.5 For information on escalation procedures please refer to the Trust Safeguarding Lead who will provide the appropriate support and advice.

15. If you have concerns about extremism - The PREVENT Strategy

- 15.1 The Prevent officer for Woodlands Academy is Joanne Doidge.
- 15.2 **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- 15.3 **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- d. Negate or destroy the fundamental rights and freedoms of others; or
- e. Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- f. Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- g. 8.7.5 **Terrorism** is an action that:
- h. Endangers or causes serious violence to a person/people;
- i. Causes serious damage to property; or
- j. Seriously interferes or disrupts an electronic system

15.4 The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause that endangers or causes serious violence to a person/people; causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause'

15.5 The PREVENT Strategy main objectives:

- a. respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- b. prevent people from becoming involved with or supporting terrorism and ensure that they are given appropriate advice and support.
- c. work with sectors and institutions where there are risks of radicalisation which we need to address.

15.6 Woodland Academy's PREVENT risk assessment arrangements:

- a. Understanding of the risks affecting children and young people in the area and fulfil the duty to prevent pupils from being drawn into terrorism.
- b. Understanding of how to identify individual pupil who may be at risk of radicalisation and what to do to support them.
- c. Internet safety-monitoring and online safety policy

15.7 Safer recruitment procedures are in place and adhered to

- a. Trustees and governance have appropriate training.
- b. Concerns raised and discussed with colleagues from the NCC Channel Programme as appropriate.
- c. All staff working with children to complete Prevent training to equip them with appropriate knowledge to identify pupils at risk.

- d. Have robust safeguarding procedures to identify and intervene with at-risk pupils.
 - e. Pupils identified as having extremist ideologies or becoming radicalised are considered as susceptible leading to monitoring by the safeguarding team. This includes recording concerns on the pupils safeguarding record.
- 15.8 Working in partnership with other agencies including Channel or the LA social care, the academy will take appropriate action and liaise with colleagues from these agencies to reduce the risk and encourage the promotion of British Value. An individual will be required to give consent before any support through the Channel programme is provided.
- 15.9 All staff are reminded that their responsibility is to NOTICE- CHECK -SHARE
- 15.10 Lead DSL to attend training through the LA training programme schedule.
- 15.11 The government website Educate Against Hate <https://educateagainsthate.com/> and charity NSPCC say that signs that a pupil is being radicalised can include:
- a. Refusal to engage with, or becoming abusive to, children who are different from themselves.
 - b. Becoming susceptible to conspiracy theories and feelings of persecution.
 - c. Changes in friendship groups and appearance.
 - d. Rejecting activities, they used to enjoy.
 - e. Converting to a new religion.
 - f. Isolating themselves from family and friends.
 - g. Talking as if from a scripted speech.
 - h. An unwillingness or inability to discuss their views.
 - i. A sudden disrespectful attitude towards others.
 - j. Increased levels of anger.
 - k. Increased secretiveness, especially around internet use.
 - l. Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
 - m. Accessing extremist material online, including via social media platforms.
 - n. Possessing extremist literature.
 - o. Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.
 - p. Children who are at susceptible to the risk of radicalisation may have low.

- q. self-esteem or be victims of bullying or discrimination.
- 15.12 It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
- 15.13 School raise awareness of online risks and equip pupils to stay safe online, both in school and outside at an appropriate level of understanding to their need. Fundamental British Values curriculum (FBV) – delivered through the schools PHSE curriculum.
- 15.14 Internet filtering security disables access to sites and content which are deemed as putting a child at risk of becoming involved in extremism or radicalisation. The IT support service has access to all data and history on devices linked to the school and can identify and alert the school to risks/potential risks.
- 15.15 The school supports families by having an open-door policy where parents/carers and members of the community can speak to the safeguarding team regarding any concerns.
- 15.15 The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism concerning a pupil. You can also email counter.extremism@education.gov.uk (Note that this is not for use in emergencies).
- 15.16 In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
- a. Think someone is in immediate danger.
 - b. Think someone may be planning to travel to join an extremist group.
 - c. See or hear something that may be terrorist related.
- 15.17 The academy can/will seek further advice from Nottingham City Prevent Education Officer. Louise Cox if required.

Louise.cox@nottinghamcity.gov.uk

Telephone 0115 8765864

16. If you have a mental health concern about a child

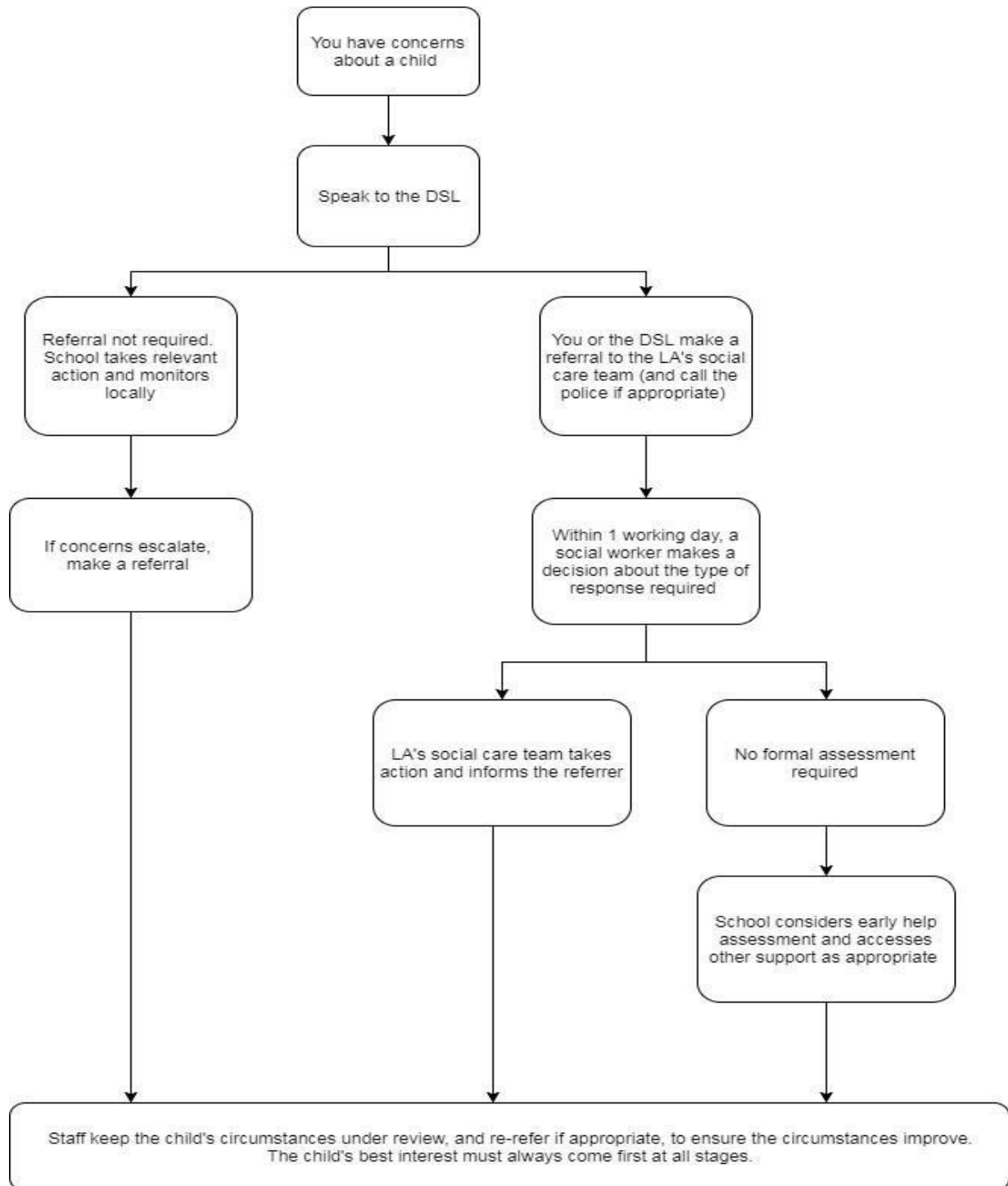
- 16.1 Mental Health Lead - Joanne Doidge
- 16.2 The trust is committed to train all staff to be mental health first aiders. Currently the staff that have completed the training are:
- a. Mark Meredith
 - b. Carolynn Rudd
 - c. Polly Smith
 - d. Karen Thornewill
 - e. Clare Westray
- 16.3 Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 16.4 Poor attendance can be an indicator that a child has poor mental health.
- 16.5 Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- 16.6 If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.
- 16.7 If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.
- 16.8 Woodlands have systems in place to support pupils who may need someone to talk to regarding their mental health and wellbeing:
- a. Mental health support team- Attend school one day a week and offer support through 1-1, small group, class group and assemblies.
 - b. DSL support and advice
 - c. ELSA support (emotional literacy)– Delivered by trained staff on a 1-1 session to support emotional well-being.
 - d. Wellbeing session – These sessions are used to support learners who require immediate and ongoing support with their mental health and wellbeing.
 - e. All pupils have a pupil profile. The pupil where appropriate has named their trusted adults they would feel safe to speak to if they required this. Non- verbal or learners with communication needs have a named familiar adult.
 - f. Pupils have a safe space named on their pupil profile if appropriate. This is a place they can go to

and wait for their trusted adult or a place that they can go to work if they need some time away from the classroom.

- g. Mental health first aiders are available one lunchtime a week for a drop-in session.
- h. Leaflets around school offer advice and where to find support.
- i. Wellbeing board for pupils to access information on how to get support.
- j. The safeguarding team provide parent / carers information on how to support their child with mental health concerns.
- k. Woodlands Youngminds lunch club for wellbeing support. All the children who attend are able to talk about their wellbeing and learn about strategies on how to cope with worries. The children are encouraged to talk, draw, colour in pictures, craft and play with the wellbeing toys and fidgets.

Figure 1 - Procedure if you have concerns about a child's welfare as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

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



17. Concerns about a staff member, supply teacher or volunteer

- 17.1 If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Academy Principal. The Academy Principal will make contact with the Trust safeguarding Lead. If the concerns/allegations are about the Principal, speak to the Trust's CEO (Sean Kelly) if the concerns/allegations are about the CEO, speak to the chair of the Board of Trustees. Contact details can be obtained through the Trust governance professional, Claire Beardsall.
Claire.Beardsall@raleightrust.org
- 17.2 Alternative providers will have their own whistle policy procedures.
- 17.3 This applies to all cases where it is alleged that a staff member, supply teacher or 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.
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 17.4 Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer, or contractor) to the head teacher, report it directly to the LADO within the LA. If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

18. Non-recent allegations

- 18.1 Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

19. Low-level concerns

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

19.2 Definition of low-level concerns:

- 19.2.1 The term 'low-level' concern does not mean that the concern is insignificant, it means that the threshold set out at the start of 8.7 has not been met. A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the academy/trust may have acted in a way that:

- a. Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- b. examples of such behaviour could include, but are not limited to:
 - i. being over-friendly with children
 - ii. having favourites
 - iii. taking photographs of children on a personal mobile phone
 - iv. engaging with a child on a one-to-one basis in a secluded area or behind a closed door
 - v. using inappropriate sexualised, intimidating, or offensive language. *Such behaviour can exist on a spectrum.*

19.3 Sharing low-level concerns

19.3.1 Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Principal and or Lead DSL. Any concerns about the Principal should be reported to the Trust Chief Executive Sean Kelly.

19.4 Recording low-level concerns

19.4.1 All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action is taken., held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a concern to meeting the harms threshold.

19.5 Low-level concerns and references

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

19.5.2 Low level concerns will be monitored by the Principal and the Lead DSL. This will be reviewed termly to monitor if patterns of behaviour are emerging. Should patterns of behaviour occur the DSL or principal will contact the local authority designated officer (LADO) to seek advice as to next steps regarding whether a referral will need to be submitted.

19.5.3 Minor conduct issues can often be resolved informally between employees and their line manager. These discussions should be held in private and without undue delay whenever a cause for concern is emerging. Where appropriate, a note of any such informal discussions may be placed on the employee's personal file. In some cases, an informal verbal warning or instruction may be given, which will not form part of the disciplinary records but may be referred to as part of any disciplinary proceedings where appropriate. This will be recorded on the staff member's file. Formal steps will be taken under this procedure if the matter is not resolved.

19.5.4 During informal action, formal investigation and any subsequent stages of the procedure, the Trust will collect, process and store personal data in accordance with our data protection policy. The data will be held securely and accessed by, and disclosed to, individuals only for the purposes of completing the disciplinary procedure.

Refer to the Trust Disciplinary policy for guidance [Raleigh Education Trust Policies \(raleightrust.org\)](http://raleightrust.org)

20. Allegations of abuse made against other pupils.

- 20.1 We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".
- 20.2 We also recognise the gendered nature of child-on-child abuse (previously known as peer-on-peer abuse). However, all child-on-child abuse is unacceptable and will be taken seriously through our referral processes and curriculum that helps pupils understand what is and what is not ok.
- 20.3 Most cases of pupils hurting other pupils will be dealt with under the Trusts Relationships & Positive Behaviour Policy and/or the individual academy's behaviour guidance, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. Child-on-child abuse is most likely to include, but may not be limited to:
- a. Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - b. Abuse in intimate personal relationships between peers
 - c. Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element that facilitates, threatens and/or encourages physical abuse)
 - d. Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that facilitates, threatens and/or encourages sexual violence)
 - e. Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
 - f. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
 - g. Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth-produced sexual imagery)

- h. Up skirting, which typically involves taking a picture under a person's clothing without their permission, to view their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- i. Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- j. Use of drugs or alcohol, where a pupil is forced/coerced to participate in.

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

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

20.5 For further information refer to the Trust Relationships & Positive Behaviour Policy, the academy's Behaviour guidance (and Anti-Bullying policy).

20.6 We will minimise the risk of child-on-child abuse by:

- a. Challenging any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- b. Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- c. Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- d. Ensuring pupils can easily and confidently report abuse using our reporting systems.
- e. Ensuring staff reassure victims that they are being taken seriously.
- f. Be alerted to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- g. Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- h. Consider intra familial harms and any necessary support for siblings following a report of sexual

violence and/or harassment.

- i. Ensuring staff are trained to understand:
 - i. How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - ii. That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
 - iii. That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will.
 - notice and react to
 - A friend may make a report.
 - A member of staff may overhear a conversation.
 - A child’s behaviour might indicate that something is wrong.
 - That certain children may face additional barriers to telling someone.
 - iv. because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - v. That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
 - vi. The important role they must play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it.
 - vii. That they should speak to the DSL if they have any concerns
 - viii. That social media is likely to play a role in the fall-out from any incident or alleged incident, including potential contact between the victim, alleged perpetrator(s) and friends from either side.

21. Sharing of nudes and semi-nudes (‘Sexting’)

21.1 Your responsibilities when responding to an incident.

- 21.1.1 If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as ‘sexting’ or ‘youth-produced sexual imagery’), you must report it to the DSL immediately.

21.1.2 The DSL will report incidents of this nature to the police in the first instance to establish whether a criminal offence has taken place. The DSL will ensure the police are aware of any referrals made to social care.

21.1.3 You must **not**:

- a. View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- b. Delete the imagery or ask the pupil to delete it.
- c. Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- d. Share information about the incident with other members of staff, pupil(s), or parents/ carers that are not directly involved with the pupil.
- e. Say or do anything to blame or shame any young people involved.

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

21.2 Initial review meeting

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

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

- i. Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- j. The DSL will make an immediate referral to police and/or children's social care if:
 - i. The incident involves an adult.
 - ii. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
 - iii. What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
 - iv. The imagery involves sexual acts and any pupil in the images or videos is under 13.
 - v. The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

21.3 Further review by the DSL

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

21.3.2 They will hold interviews with the pupils involved (if appropriate).

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

21.4 Informing parent/carers

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

21.5 Referring to the police

21.5.1 If it is necessary to refer an incident to the police, this will be done via calling 101.

21.6 Recording incidents

21.6.1 All sexting incidents and the decisions made in responding to them will be recorded via our electronic safeguarding system.

21.7 Curriculum Coverage

21.7.1 Pupils are taught about the issues surrounding sexting as part of our Jigsaw PSHE curriculum and equals curriculum in ICT and Life skills lessons. The curriculum is adapted to meet the learning and level of understanding needs of our pupils.

21.7.2 School will also involve the schools police intervention officer to deliver workshops around the law and sexting to individual groups where appropriate and necessary.

21.7.3 The curriculum covers the following in relation to the sharing of nudes and semi-nudes:

- a. What it is
- b. How it is most likely to be encountered
- c. The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment.
- d. Issues of legality
- e. The risk of damage to people's feelings and reputation
- f. Pupils also learn the strategies and skills needed to manage:
 - i. Specific requests or pressure to provide (or forward) such images.
 - ii. The receipt of such images

21.7.4 This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

v. Teaching follows best practice in delivering safe and effective education, including:

Putting safeguarding first

Approaching from the perspective of the child

Promoting dialogue and understanding

Empowering and enabling children and young people

Never frightening or scare-mongering

Challenging victim-blaming attitudes

21.8 Notifying parent/carer(s)

- 21.8.1 Where appropriate, we will discuss any concerns about a child with the child's parent/carers. The DSL will normally do this in the event of suspicion or disclosure.
- 21.8.2 Other staff will only talk to parent/carers about any such concerns following consultation with the DSL.
- 21.8.3 If we believe that notifying the parent/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- 21.8.4 In the case of allegations of abuse made against other children, we will normally notify the parent/carers of all the children involved.

21.9 Reporting systems for our pupils

- 21.9.1 Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
- 21.9.2 We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
- 21.9.3 To achieve this, we will:
 - a. Put systems in place for pupils to confidently report abuse. The pupils have tutor time in a morning and opportunity to talk to a member of staff. Pupils can ask to speak to their trusted member of staff any time of the day if they need to speak to someone. School has wellbeing rooms within school where pupils can go and feel safe when speaking with a member of staff. Pupils can also ask to speak to a DSL.
 - b. Ensure our reporting systems are well-promoted, easily understood and easily accessible for pupils. The pupil will be given updated information on a regular basis and reassured that they can speak to a DSL or their trusted adult when they need to.
 - c. Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- 21.9.4 Pupils will be made aware of their academy's reporting systems through discussions during PSHE/RSE lessons, assemblies, and information boards etc. Display boards are reviewed termly, and new information is added when necessary. All pupils have access to these boards.
- 21.9.5 Where appropriate, pupils have named trusted adults they can request to speak to when necessary. Pupils are advised that this cannot always be instant but reassured one of the named adults will be notified.
- 21.9.6 Curriculum plans are reviewed as part of the annual safeguarding audit and when necessary, discussed in SLT meetings.

21.10 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

Woodlands Academy recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

Staff will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy. Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

22. Pupils with special educational needs and disabilities

22.1 We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- a. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- b. Pupils being more prone to peer group isolation than other pupils.
- c. The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- d. Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so
- e. Communication barriers and difficulties in overcoming these barriers.

22.2 Woodlands want all pupils to feel safe and be able to talk to staff about any worries or concerns. We know this is difficult for some of our pupil's, but we encourage, where appropriate that pupils name a 'trusted adult' that they feel comfortable to speak to. Named adults are on the pupil profiles, all staff have access to pupils' profiles.

22.3 For pupils who are non-verbal or have limited speech and language will have a familiar staff member as their named adult. This person should be able to identify behaviours that would not normally be displayed by the pupil and ask questions appropriate to the level of understanding to the pupil. Makaton signing may be used to communicate with the pupil and to ascertain information regarding a pupil's well-being or any concerns.

23. Children missing from education.

23.1 We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parent /carers when pupils are not at school. This means we need to have at least two contact numbers for parent /carers. Parent/carers should remember to update the school as soon as possible if the numbers.

- 23.2 If there is a concern a child may be missing from education (CME), the academy's DSL will follow Nottingham City protocols and procedures for reporting CME. The Trust attendance team ensure all our pupils are safe by tracking attendance daily, home visit welfare checks will be completed by the team for any pupil who is absent for consecutive days and there are concerns. A member of the attendance team attends the weekly safeguarding meeting so that information can be shared and actioned related to missing children or persistent absentees as a precaution to prevent a child from going missing.
- 23.3 We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the academy without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable when removing a child's name from the admission register at non-standard transition points.
- 23.4 If assistance is required from the Trust attendance team this would be communicated either through email, COMPS, telephone, or face to face dependent on urgency. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the Police, if the child is in immediate danger or at risk of harm.
- 23.5 Staff are trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.
- 23.6 Woodlands Principal, Lead DSL, deputy DSL and attendance team meet weekly to discuss attendance and safeguarding. Information and actions can be shared at this meeting relating to missing children or persistent absentees as a precaution to prevent a child going missing.

24. Together we can stop child sexual abuse.

- 24.1 No child should be a victim of sexual abuse (please see appendix 1) and the school is committed to preventing children from becoming/being victims of sexual abuse. If staff have any concerns, they must report these to the DSL immediately or/and contact the NSPCC on:

Tel: 0800 800 5000

Email: help@nspcc.org.uk

For further information please visit the 'Stop abuse together campaign' website <https://stopabusetogether.campaign.gov.uk/>

25. Contextual Safeguarding

- 25.1 Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. **All** staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.
- 25.2 Children's social care assessments should consider such factors so schools and must provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.
- 25.3 As a school the most recognised contextual safeguarding concern is online safety. This is child on child relationships online abuse. As a school we have systems in place to educate the pupils on safe online use. Some of this support is 1-1, delivered through PHSE lessons, ELSA sessions and workshops delivered by the police interventions officer.

26. Pupils with a social worker

- 26.1 Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.
- 26.2 The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- 26.3 Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare, and educational outcomes. For example, it will inform decisions about:
- a. Responding to unauthorised absence or missing education where there are known safeguarding risks.
 - b. The provision of pastoral and/or academic support

27. Looked after children and previously looked after children (known in Nottingham as Children in care)

- 27.1 Paul Wyles is the designated person for looked after children.
- 27.2 We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
- a. Appropriate staff have relevant information about children's' looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
 - b. The DSL has details of children's social workers and relevant virtual school heads.
- 27.3 Our academy has an appointed designated teacher (please see 'Important contacts'), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children (children in care - Nottingham) in line with statutory guidance.
- 27.4 The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- 27.5 As part of their role, the designated teacher will:
- a. Work closely with the DSL to ensure that any safeguarding concerns regarding Children in Care after and previously children in care are quickly and effectively responded to.
 - b. The designated person for Children in care (CIC) will update all information regarding these learners on CPOMS. This information is restricted to DSLs only. Information will be shared, if necessary, with other staff members. The designated person for CIC will discuss these learners in the weekly SLT meeting or earlier if necessary.
 - c. The designated person for CIC attends all PEP meetings and the Lead DSL or deputy attends the CIC reviews. If a member of staff is not going to be available a report will be sent.
 - d. It is the responsibility of the designated person for CIC to collate information for the PEP and CIC reviews.
 - e. All documents and information from the meetings will be updated on CPOMS except for ePEPs. An update from these meetings will be added to CPOMS by the designated person for CIC.
 - f. Work with virtual school heads to promote the educational achievement of looked after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

28. Pupils who are lesbian, gay, bisexual or gender questioning

- 28.1 We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

- 28.2 We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.
- 28.3 When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.
- 28.4 When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).
- 28.5 We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.
- 28.6 Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

29. Online Safety and the use of mobile technology

- 29.1 We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.
- 29.2 To address this, our school aims to:
- a. Have robust processes in place to ensure the online safety of pupils, staff, volunteers, and governors.
 - b. Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
 - c. Set clear guidelines for the use of mobile phones for the whole school community.
 - d. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
 - e. Receive regular website filter alerts from IT support and act accordingly.
 - f. Alternative provision providers have their own systems in place for website filtering. This forms part of the safeguarding audit of the provision

29.3 The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact – being subjected to harmful online interaction with other users, such as peer to-peer pressure, commercial advertising and adults posing as children or young adults to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual, and nonconsensual 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

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

- a. Educate pupils about online safety as part of our Jigsaw PHSE curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
- b. Ensure staff complete relevant training as part of their induction on safe internet use and online safety issues, including cyberbullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- c. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- d. Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- e. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. Smoothwall is used for robust filtering and send alerts to key staff in the academy to respond accordingly. The reporting system will have an instant response when required as well as weekly reporting. The DSL will have an overview of all concerns raised directly and through CPOMS.
- f. An action plan is being developed to carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- g. Review the child protection and safeguarding policy, including online safety, annually and

ensure the procedures and implementation are updated and reviewed regularly.

29.3.3 For further information please refer to the academy's Online Safety/E-Learning Policy.

30. Intimate Care

- 30.1 Woodlands Academy takes the health and wellbeing of our pupils very seriously. We aim to support pupils with physical disabilities and illnesses and enable them to have a full and rich academic life whilst at school.
- 30.2 The Governing Body recognises its duties and responsibilities in relation to the Disability Discrimination Act which requires that any child with an impairment that affects his/her ability to carry out normal day- to-day activities must not be discriminated against.
- 30.3 Pupils will always be treated with care and respect when intimate care is given, and no child will be left feeling embarrassed.
- 30.4 Wherever possible, staff involved in intimate care will not be involved in the delivery of sex education to the pupil in their care as an extra safeguard to both staff and pupil involved.
- 30.5 Individual intimate care plans will be drawn up for children as appropriate to suit the circumstances of the child.
- 30.6 Each child's right to privacy will be respected. Careful consideration will be given to each child's situation to determine how many carers will need to be present when the child is toileted.
- 30.7 If any member of staff has concerns about physical changes to a child's presentation, such as marks or bruises, they will immediately report the concerns to the Designated safeguarding Lead or a deputy DSL.
- 30.8 Further information is available in Woodlands Intimate Care Policy.

31. Mobile phones and cameras

- 31.1 Photographs of learner's work is used as evidence towards progress, especially our EYFS learners and learners working significantly below age related learning. These photographs are taken on the school iPads and are transferred onto the schools IT system.
- 31.2 The use of class dojo is the reward system. Class dojo is linked to parent email addresses allowing school to share instant recognition of their child's achievements. This is especially beneficial for our non-verbal learners. These images are sent directly to the parent/ carer and are not shared with anyone else. Photographs sent are then uploaded onto the school system for evidence of achievement.
- 31.3 Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- 31.4 We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

32. Complaints and concerns about school

- 32.1 Complaints against staff that are likely to require a child protection investigation will be handled following our procedures for dealing with allegations of abuse made against staff (section 8). Also, please refer to the Trust's complaints policy.

33. Whistleblowing

- 33.1 Please see Trust's Whistle-blowing policy.
[Raleigh Education Trust Policies \(raleightrust.org\)](https://raleightrust.org)

- 33.2 NSPCC Whistle-blowing helpline: 0800 0280285

34. Record-keeping

- 34.1 We will hold records in line with our records retention schedule.
- 34.2 All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded via the electronic safeguarding system. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.
- 34.3 Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- 34.4 Safeguarding records relating to individual children will be retained in line with KCSIE 2023 and the Trust's retention schedule.
- 34.5 If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. Also, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

35. Training

35.1 All Staff

- 35.1.1 All staff members will undertake safeguarding and child protection procedures training at induction, including whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. New staff will receive safeguarding training within the first half term should any existing training received be old or out of date. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners. This training will include an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
- 35.1.2 All staff will complete the Trust's mandatory safeguarding e-learning modules scheduled throughout the academic year. Safeguarding training will be tracked via the academy's MIS.

35.1.3 All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This training will be refreshed annually via the Home Office online course.

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

35.1.5 Volunteers will receive appropriate training, if applicable.

35.1.6 All staff are to receive annual and ongoing contextualised safeguarding training, which includes:

- a. Update information from the DSL network meeting in relation to contextualised safeguarding concerns in the local area.
- b. Update information from the DSL regarding trending behaviour within the school and actions being taken.
- c. Ongoing training such as child sexual exploitation, child criminal exploitation, protecting children from county lines.

35.1.7 Each offsite education provider has their own CPD offer, and they provide relevant training for their staff. The half-termly AP network meeting is a further opportunity where relevant safeguarding updates are discussed – these include sharing key updates from the termly Nottingham City DSL network.

35.1.8 All staff are aware a child may not be ready to disclose concerns. Staff should maintain professional curiosity and report to the DSL.

35.2 The Designated Safeguarding Lead (DSL) and deputy DSL(s)

35.2.1 The DSL will undertake child protection and safeguarding training at least every 2 years.

35.2.2 In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through Nottingham city DSL termly networks, e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

35.2.3 They will also undertake Prevent awareness training annually.

35.2.3 The DSLs will be supported by the Trust Safeguarding Lead and the Safeguarding Network.

35.3 Board of Trustees/ Governors

35.3.1 All trustees/governors receive safeguarding training at induction which is updated annually. This is to make sure that they:

- a. Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- b. Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding. As the chair of trustee/governors may be required to act as the 'case manager' if an allegation of abuse is made against the principal/headteacher, they receive training in managing allegations for this purpose.

36. Recruitment – interview panels

36.1 Please refer to the Trust’s Safer Recruitment policy.

<https://www.raleightrust.org/wp-content/uploads/sites/2/2021/02/Recruitment-and-SelectionPolicy-01.12.20.pdf>

36.2 We ensure that offsite education providers provide us evidence that they have made the appropriate level of safeguarding and recruitment checks on staff they directly employ. This includes directly supporting Alternative provisions in completing the prohibition of teaching check for their staff. This forms part of the safeguarding checklist that is completed annually.

37. Staff who have contact with pupils and families

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

37.2 At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

38. Restrictive Positive Intervention

38.1 Restraint may be necessary to safeguard the individual and/or others from serious injury or harm, and sometimes it will be the only realistic option, for example, to prevent a child from running into a busy road.

38.2 We aim to promote a positive and proactive approach to behaviour, including de-escalation techniques appropriate to the child or young person, to minimise the likelihood of or avoid the need to use restraint.

38.3 The use of restraint is based on an assessment of risk and to safeguard the individual or others.

38.4 Restraint should only be used where it is necessary to prevent the risk of serious harm, including injury to the child or young person.

38.5 For further details please read the Trust Relationships & Positive Behaviour, and Restrictive Physical Intervention policies.

39. Safe Touch

- 39.1 Used in context and with empathy, touch supports the development of our natural interactions with the pupils we care for. It can also be key to developing fundamental social, behavioural and attention skills. Whilst offering physical support to those pupils who need it. Any pupils who require safe touch, this is stated in their pupil profile, all staff including supply staff have access to these pupil profiles.
- 39.2 Communication – touch is beneficial as part of the process of establishing the fundamentals of communication (Nind and Hewett, 1994) for people at early communication levels. Touch is necessary to reinforce other communication (e.g., hand on shoulder when speaking) or to function as the main form of communication. Touch enables staff and pupils to respond nonverbally.
- 39.3 In the yellow and green curriculum safe touch is likely to occur regularly. Physical prompting and support, gestural and physical prompts during learning activities such as hand-over-hand support and hand-underhand support. Play activities naturally include touch. Pupils in the yellow curriculum are at early levels of development and are likely to be tactile and physical. Staff may be required to hold the hands of some pupils when moving from one activity to another or to keep them safe when out of the classroom.
- 39.4 Some of these pupils require comfort in the form of a hug when distressed. This needs to take place with other staff around. Staff can sit closely next to the pupil and place their arm around the pupil's shoulder to comfort. This needs to be for the minimal amount of time required and parents need to be informed if this has happened. Physical support may also be necessary to include a pupil in activities such as sensory circuits, swimming, and Physical Education
- 39.5 Pupils in the green and blue developmental levels need to be considered as they can often be more relevant to our pupils needs than their chronological age. Acceptable safe touch could be a fist bump or high five to support recognition of achievement. In times of distress a staff member can offer comfort with their hand on the pupils' shoulder as reassurance. This should be for the minimal time necessary and with staff as a witness.
- 39.6 Mobility- Physical support may be used as guidance and/or to help with mobility or as part of an activity where a pupil needs support when moving.
- 39.7 It is not appropriate to touch students in the following areas:
- a. Genitals
 - b. Chest / breast
 - c. Bottom
 - d. Except for:
 - i. First aid
 - i. Intimate/ Personal care
 - ii. Medical needs

39.8 In these circumstances staff should ensure that there is another member of staff present who the pupil is comfortable and familiar with.

39.9 All staff have a responsibility to always ensure safe and appropriate practice.

40. Screening and searching process.

40.1 Please refer to the [Trust Relationships & Positive Behaviour Policy](#)

41. Monitoring arrangements

41.1 This policy will be reviewed **annually**. At every review, it will be approved by the full governing board.

42. Links with other policies

42.1 All policies can be found on the Raleigh Trust website

[Raleigh Education Trust Policies \(raleightrust.org\)](http://raleightrust.org)

42.2 This policy links to the following policies and procedures:

- a. Relationships & Positive Behaviour Policy, and the academy's behaviour guidance
- b. Anti-bullying
- c. Restrictive Positive Intervention
- d. Staff Code of Conduct (also known as staff behaviour policy)
- e. Whistle-blowing
- f. Complaints
- g. Health and Safety
- h. Attendance
- i. Online safety/E-learning
- j. Equality
- k. Sex and relationship education
- l. First aid
- m. Curriculum
- n. Privacy notices

- o. Safer Recruitment
- p. GDPR, Data protection
- q. Disciplinary
- r. SEND

Appendix 1

These appendices are based on the Department for Education’s statutory guidance, Keeping Children Safe in Education & working together to safeguard children.

1.1. types of abuse

- 1.1.1. **Abuse**, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.
- 1.1.2. **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces, illness in a child.
- 1.1.3. **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may involve:
 - a. Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
 - b. Not giving the child opportunities to express their views, deliberately silencing them or ‘making fun of what they say or how they communicate.
 - c. Age or developmentally inappropriate expectations are being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction.
 - d. Seeing or hearing the ill-treatment of another
 - e. Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- 1.1.4. **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 the child is aware of what is happening. The activities may involve:
 - a. Physical contact, including assault by penetration (for example rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

- b. Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
- c. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

1.1.5. **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

1.2. Up skirting

1.2.1. "The Voyeurism (Offences) Act, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. 'Up skirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender can be a victim." (Keeping Children Safe in Education Sept 2020).

1.3. Fabricated-induced illness.

1.3.1. Fabricated or induced illness (FII) is a form of child abuse, It occurs when a parent or carer, usually the child's biological mother exaggerates or deliberately causes symptoms of illness in the child. FII is also known as Munchausen's syndrome by proxy. FII is a child protection issue and cannot be treated by the NHS alone. Therefore, if staff suspect FII they must follow their Academies safeguarding procedures by reporting concerns through the safeguarding electronic system and informing the DSL immediately, the DSL will refer the concerns to the Children and Families direct (Social Care). If you suspect that someone you know may be fabricating or inducing illness in their child, it is not recommended that you confront them directly. A direct confrontation is unlikely to make a person admit to wrongdoing, and it may allow them to dispose of any evidence of abuse.

Appendix 2: Specific Safeguarding Issues

Some children and young people may be particularly vulnerable to abuse and harm. The designated safeguarding lead should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (Safeguarding Partnership) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm. It must be noted some of the texts are directly taken from Keeping Children Safe in Education.

2.1. Child Sexual Exploitation

- 2.1.1. The statutory definition of Child Sexual Exploitation
- 2.1.2. Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:
 - a. in exchange for something the victim needs or wants, and/or
 - b. for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. It may, or may not, be accompanied by violence or threats of violence. Child sexual exploitation does not always involve physical contact; it can also occur using technology.
- 2.1.3. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.' (Department for Education, 2012).
- 2.1.4. Child sexual exploitation is a form of abuse that involves children (male and female, of different ethnic origins and different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify, and respond to children at risk of sexual exploitation.

2.2. Who is at risk?

- 2.2.1. Child sexual exploitation can happen to any young person from any background. Although the research suggests that females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.
- 2.2.2. The characteristics common to all victims of CSE are not those of age, ethnicity, or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation, or fear. Sexual exploitation can happen face to face, and it can happen online. It can also occur between young people.

2.2.3. In all its forms, CSE is child abuse and should be treated as a child safeguarding issue.

2.3. Child Criminal Exploitation (CCE)

2.3.1. CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity;

- a. in exchange for something the victim needs or wants, and/or
- b. for the financial or other advantage of the perpetrator or facilitator and/or
- c. through violence or the threat of violence.

2.3.2. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

2.3.3. Some of the following can be indicators of CCE:

- a. children who appear with unexplained gifts or new possessions.
- b. children who associate with other young people involved in exploitation.
- c. children who suffer from changes in emotional well-being.
- d. children who misuse drugs and alcohol.
- e. children who go missing for periods or regularly come home late.
- f. children who regularly miss school or education or do not take part in education.

2.4. County Lines

2.4.1. Criminal exploitation of children (CEC) is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

2.4.2. When children are not attending school, the risk that they could be exploited either criminally and/or sexually is heightened. In line with the Local Authority procedures, a CME (child missing in education) referral will be made in line with the timescales set out in the Attendance and Punctuality Policy. When the child returns to school, teachers and staff must be aware of the signs and symptoms of trauma and refer any concerns swiftly. DSLs can seek support in the case of exploitation by completing a Children at Risk of Exploitation Toolkit and contacting the Exploitation Coordinator; rachael.osborne@nottinghamcity.gov.uk

2.5. Modern Slavery and the National Referral Mechanism

- 2.5.1. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/993172/Modern_Slavery_Statutory_Guidance_EW_Non-Statutory_Guidance_SNI_v2.3.pdf

2.6. Honour-Based Abuse including Forced Marriage

- 2.6.1. Honour Based Abuse is a cultural, not a religious phenomenon. It impacts a range of communities. The challenges for services include developing responses that keep people safe and hold perpetrators to account without stereotyping, stigmatising, or making assumptions about any given individual or community.
- 2.6.2. Honour Based Abuse, which may include forced marriage and/or female genital mutilation, is perpetrated against children and young people for several reasons. These include:
- a. Protecting family 'honour' or 'Izzat'
 - b. To control unwanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual, or transgender)
 - c. As a response to family, community, or peer group pressure
 - d. Strengthening family links
 - e. Protecting perceived cultural and/or religious ideals (misguided or dated)
 - f. Retaining wealth, property, or land within the family
 - g. Preventing unsuitable relationships
 - h. Assisting claims for residence and citizenship in the UK
 - i. Perceived immoral behaviour.
 - j. Inappropriate make-up or dress
 - k. Possession and/or use of a mobile telephone
 - l. Kissing or showing other forms of intimacy in public
 - m. Rejecting a forced marriage

- n. Being a victim of rape or other serious sexual assault
- o. Inter-faith relationships
- p. Seeking a divorce.

2.7. Forced Marriage

- 2.7.1. 'A forced marriage is a marriage in which one or both spouses do not (or, in the case of children and some adults at risk, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual, and emotional pressure.' It is illegal to cause a child under the age of 18 to marry, even if violence, threats, or coercion are not involved. This applies to non-binding, unofficial 'marriages' as well as legal marriages.
- 2.7.2. Scottish Government: "A marriage conducted without the valid consent of both parties where duress is a factor." A Choice by Right (June 2000)
- 2.7.3. Forced Marriage (Civil Protection) Act 2007 (England/Wales)
- 2.7.4. Courts have the power to make Forced Marriage Protection Orders.
- 2.7.5. Breach of an injunction would not itself be a criminal offence but would be a contempt of court. Courts would have the full range of sanctions available to them, including imprisonment.
- 2.7.6. Enables third parties to apply for an injunction on behalf of somebody.
- 2.7.7. There will be a maximum penalty of seven years for committing a forced marriage offence and a maximum penalty of five years for breach of a forced marriage protection order.
- 2.7.8. Staff must report concerns regarding forced marriage to the DSL immediately to ensure safeguarding procedures can be implemented, the DSL will inform the Academy Principal, Children and Families social care and the police.

2.8. Private Fostering

- 2.8.1. A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.
- 2.8.2. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents, or cousins.
- 2.8.3. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before a private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

- 2.8.4. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes halfsiblings and stepparents; it does not include great-aunts or uncles, great grandparents, or cousins.
- 2.8.5. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not doing so is a criminal offence.
- 2.8.6. Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.
- 2.8.7. Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools must inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.
- 2.8.8. School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself must inform the local authority of the private fostering arrangements.
- 2.8.9. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

2.9. Preventing Radicalisation

- 2.9.1. Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counterterrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all academies.
- 2.9.2. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation and are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology. The guidance on this has not yet been published but we will be sharing this as soon as possible as well as keeping you informed on how we are coordinating this in a partnership approach.
- 2.9.3. In the meantime, if you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact the Prevent Team prevent@nottinghamshire.pnn.police.uk. Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

2.9.4. To minimise the risk, staff will look out for early signs of radicalisation/extremism, such as pupils.

- a. showing sympathy for extremist causes
- b. glorifying or advocating violence, especially to other faiths or cultures
- c. intolerance of difference, including faith, culture, gender, race, or sexuality

2.10. Incels Community

2.10.1. Definition of Incels: A member of a sprawling online community. Incels are men who describe themselves as “involuntary celibates”.

“They see women as completely commodified and dehumanised sex objects [that] are there purely for male sexual pleasure. And they blame women for the fact that they’re not having sex.” (Guardian, 2021)

2.10.2. Possible indicators of incels involvement could include:

- a. include derogatory comments/writings/drawings about women.
- b. social isolation/exclusion and general signs of radicalization

2.10.3. If staff have any concerns about a student being involved with the incel community or sharing incel ideology, they must report this immediately to the DSL/safeguarding team.

2.11. Child-on-child abuse

2.11.1. There must be a zero-tolerance approach to abuse. Pupils are taught to understand their rights and responsibilities, what to do if they are unhappy with something and what it means to give true consent. This is delivered through PHSE / RSE curriculum in an age-appropriate way for their learning need of the pupils.

2.11.2. Child-on-child abuse must always be investigated as soon as it is reported and may result in a multi-agency response.

2.11.3. The person investigating must gather as much information as possible. They must report the incident as soon as information has been gathered.

2.11.4. We are aware pupils that are perpetrators are often victims of abuse themselves, we will support both the victim and the perpetrator.

2.11.5. School must have support and protection in place for the victim. This would be decided on a case-by-case basis but could be daily support from the wellbeing mentor or professional support from another agency.

2.11.6. A typical response may involve

- a. Social care
- b. Police
- c. Specialist service

2.11.7. This will, likely, adversely affect the victim's educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

2.11.8. School would need to consider whether it was appropriate for the perpetrator to remain in school or if a risk assessment needs to be put into place.

2.11.9. All actions and information must be recorded on the electronic recording system (CPOMS)

2.11.10. Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

2.11.11. Child-on-child abuse is most likely to include, but may not be limited to:

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

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

2.11.12. If staff have any concerns about child-on-child abuse, or a child makes a disclosure to them, report immediately to the DSL.

2.11.13. The academy supports children to understand the law, this could include direct/indirect work from/with the Police Intervention Officer.

2.12. Sexual violence and sexual harassment between children in schools

2.12.1. Sexual violence and sexual harassment can occur:

- a. Between 2 children of any age and sex
- b. Through a group of children sexually assaulting or sexually harassing a single child or group of children
- c. Online and face-to-face (both physically and verbally)
- d. Sexual violence and sexual harassment exist on a continuum and may overlap.

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

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

- a. Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- b. Regularly review decisions and actions, and update policies with lessons learnt.
- c. Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- d. Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- e. Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.

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

2.12.4. Staff should be aware of the importance of:

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

2.12.5. If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to DSL immediately.

2.13. Serious violence

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

- a. Increased absence from school
- b. Change in friendships or relationships with older individuals or groups.
- c. Significant decline in performance
- d. Signs of self-harm or a significant change in wellbeing
- e. Signs of assault or unexplained injuries

2.13.2. Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

2.13.3. For further information please go to the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance

2.13.4. Risk factors that increase the likelihood of involvement in serious violence include:

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

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

2.14. Children who self-harm

2.14.1. Staff **must** always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary-age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse.

2.15. Domestic abuse

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

2.15.2. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill-treatment that isn't physical, as well as witnessing the ill-treatment of others – for example, the impact of all forms of domestic abuse on children, including where they see, hear or experience its effects.

2.15.3. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

2.15.4. Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

2.15.5. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

2.15.6. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day – part of Operation Encompass (see section 80).

2.16. Operation Encompass

2.16.1. Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the designated safeguarding lead in school before the child or children arrive at school the following

day.

- 2.16.2. Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 2.16.3. Older children may also experience domestic abuse and/or violence in their relationships.
- 2.16.4. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.
- 2.16.5. The DSL will provide support according to the child's needs and update records about their circumstances.

2.17. Homelessness

- 2.17.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- 2.17.2. The DSL will be aware of contact details and referral routes to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and following local procedures).
- 2.17.3. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

2.18 Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

- 2.18.1 All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.
- 2.18.2 There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents:

a. Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family. Potential signs of adult-involved grooming and coercion can include the child or young person

being:

- k. Contacted by an online account that they do not know but appears to be another child or young person
- l. Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- m. Moved from a public to a private/E2EE platform
- n. Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- o. Offered something of value such as money or gaming credits
- p. Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

b. Financially motivated

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- q. Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- r. Use images that have been stolen from the child or young person taken through hacking their account
- s. Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- t. Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- u. Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- v. Moved from a public to a private/E2EE platform
- w. Pressured into taking nudes or semi-nudes
- x. Told they have been hacked and they have access to their images, personal information and contacts
- y. Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

Appendix 3: Information and support

3.1. There is a wealth of information available to support schools, colleges, and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

- a. Child Net provide guidance for schools on cyberbullying.
- b. Educate Against Hate provides practical advice and support on protecting children from extremism and radicalisation.
- c. London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements.
- d. NSPCC provides advice on all aspects of a school or college's online safety arrangements.
- e. Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective.
- f. Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones.
- g. Southwest Grid for Learning provides advice on all aspects of a school or college's online safety arrangements.
- h. Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- i. UK Council for Internet Safety have provided advice on sexting-in-schools-and-colleges and using external-visitors-to-support-online-safety-education.
- j. Remote education, virtual lessons, and live streaming
- k. Case studies on remote education practice are available for schools to learn from each other.
- l. Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely.
- m. London Grid for Learning guidance, including platform-specific advice.
- n. National cybersecurity centre guidance on choosing, configuring and deploying video conferencing.
- o. National cybersecurity centre guidance on how to set up and use video conferencing 23.
- p. UK Safer Internet Centre guidance on safe remote learning

(i) Support for children

3.2.1. Childline for free and confidential advice

3.2.2. UK Safer Internet Centre to report and remove harmful online content.

3.2.3. CEOP for advice on making a report about online abuse

(ii) Parent Support

3.2.4. If DSLs begin to build a school website section to support and guide families. This information should be included.

- a. Child net offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support.
- b. Common sense media provide independent reviews, age ratings, & other information about all types of media for children and their parent/carers
- c. Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying.
- d. Government advice about security and privacy settings, blocking unsuitable content, and parental controls.
- e. Internet Matters provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world.
- f. Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation.
- g. London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary-aged children safe online.
- h. Lucy Faithfull Foundation Stop It Now resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- i. National Crime Agency/CEOP Think U Know provides support for parents and carers to keep their children safe online.
- j. Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games.
- k. Parent Zone provides help for parents and carers on how to keep their children safe online.

- l. Parent info from Parent Zone and the National Crime Agency provides support and guidance for parents from leading experts and organisations.
- m. UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online.

Appendix 4: Role of the DSL

(iii) Role of the Designated Safeguarding Lead

The designated safeguarding lead should take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). **The DSL must be a member of the senior leadership team.**

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.

The designated safeguarding lead should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

The DSL should understand when they should consider calling the Police and what to expect when they do.

During term time, the DSL should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.

The DSL should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. In addition to their formal training as set out above, their knowledge and skills should be updated (for example via ebulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

Deputy Designated Safeguarding Leads

The Deputy Designated Safeguarding Leads should be trained to the same standard as the Designated Safeguarding Lead and the role should be explicit in their job description. The deputy (or multiple deputies) must be able to perform the role of the DSL in the absence of the DSL.

The job descriptions can be found below for both DSL and DDSL.

(iv) Job description Designated Safeguarding Lead

JOB TITLE: Designated Safeguarding Lead (DSL)

LOCATION: Based at the academy

REPORTING TO: The Director of Education

CONTRACT: Permanent. Full time.

The Designated Safeguarding Lead will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL will have a leadership position in the academy. They 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, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Key Accountabilities:

Manage referrals.

- The Designated Safeguarding Lead will:
- Refer cases of suspected abuse to the local authority children's social care as required.
- Support staff who make referrals to local authority children's social care.
- Refer cases to the Channel programme where there is a radicalisation concern.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and to the local authority's designated officer.
- Refer cases where a crime may have been committed to the Police.

Work with others.

- The Designated Safeguarding Lead will:
- Liaise with the Raleigh Education Trust safeguarding lead to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations.
- As required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.
- Liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice, and expertise for all staff.
- Link closely with the three local safeguarding partners.

Training

The Designated Safeguarding Lead will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The Designated Safeguarding Lead will undertake Prevent awareness training.

The DSL will keep up-to-date with latest information about safeguarding so that their knowledge and skills are

refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments).

The DSL will:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- ensure each member of staff has access to, and understands, the academy child protection policy and procedures, especially new and part time staff.
- be alert to the specific needs of children in need, those with special educational needs and young carers.
- can keep detailed, accurate, secure written records of concerns and referrals.
- understand and support the academy with regards to the requirements of the Prevent duty and can provide advice and support to staff on protecting children from the risk of radicalisation.
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online.
- have an overview of the filtering arrangements across the academy and be responsible for the monitoring arrangements for online safety.
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- Ensure the academic/pastoral progress of all children who need a social worker by ensuring regular reviews of their holistic progress.

Raise Awareness

The Designated Safeguarding Lead will:

- ensure the academy child protection policy is known, understood and used appropriately and is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, working with the Trust Safeguarding lead.
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the academy.
- link with the Local Safeguarding Partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- provide appropriate reports and information to the academy and the trust.

Child Protection File

The DSL, where children leave the academy, will ensure their child protection file is transferred to the new school or college within 5 days. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained (if CPOMS is not the tool for transfer). Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEND in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the Designated Safeguarding Lead should always be available (during academy hours) for staff in the academy to discuss any safeguarding concerns.

(v) Job Description Deputy Designated Safeguarding Lead:

JOB DESCRIPTION

JOB TITLE:	Deputy Designated Safeguarding Lead (DDSL)
LOCATION:	Based at the academy
REPORTING TO:	The DSL and the Principal

The Deputy Designated Safeguarding Lead will support the DSL to safeguard and protect children (including online safety). The DDSL 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, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Key Accountabilities:

Manage referrals.

The deputy designated safeguarding lead will when the DSL is unavailable or out of the academy:

- refer cases of suspected abuse to the local authority children's social care as required.
- support staff who make referrals to local authority children's social care.
- refer cases to the Channel programme where there is a radicalisation concern.
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required and to the local authority's designated officer;
- refer cases where a crime may have been committed to the Police.

Work with others

The deputy designated safeguarding lead will support the DSL to:

- liaise with the Headteacher to inform her/him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations.
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.
- liaise with staff on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice, and expertise for all staff.

Training

The deputy designated safeguarding lead will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The deputy designated safeguarding lead will undertake Prevent awareness training.

The DDSL will keep up-to-date with latest information about safeguarding so that their knowledge and skills are refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments).

The DDSL will:

understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.

have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff.

are alert to the specific needs of children in need, those with special educational needs and young carers.

are able to keep detailed, accurate, secure written records of concerns and referrals.

Appendix 5: Online Safeguarding/ Filtering and Reporting

The Raleigh Education Trust has deployed Smoothwall as the border firewalls and internet filtering and safeguarding solution for the staff and learners for protection of their online digital learning environment. This provides real-time, content-aware, and granular filtering control of all users and devices. A baseline 'block' list of categories has been pre-defined by the Trust and implemented across all schools and does vary between staff users and student users.

The following details are based on the initial deployment of Smoothwall across the schools, and both the filtering and reporting will be developed and enhanced through usage and feedback from the schools and safeguarding leads as the systems become further established to meet your teaching and learning needs.

There are a wealth of reports and logging features available, but the safeguarding elements are summarised in this document:

Immediate Safeguard Reporting:

Should an online activity trigger one of the pre-determined categories:

Abuse, Adult content, Bullying, Criminal activity, Radicalisation, Substance abuse and suicide.

The nominated safeguarding lead (Table 1) will receive an email notification (Fig 1) as an example of this. The nominated safeguarding lead will only receive notifications for users associated with their school.

Ambleside Academy	Denewood Academy Unity Academy	Westbury Academy	Woodlands Academy
Joanne Barstow	Michelle Gull	Dan Siddons	Joanne Doidge
Louise Marsh	Rebecca Jones	Ki Addis	Polly Smith

Table 1

The notification gives a baseline for further in-depth analysis if required of the user's browsing history. It is important to be aware that a trigger does not mean the user was explicitly searching for the content.

When multiple breaches occur against the same user and ruleset, and instant alert is only sent every ten minutes, so as not to bombard the safeguarding leads with message.

Reporting:

Smoothwall logs all internet activity, and these logs are identifiable to the individual user. Many reports can be generated (examples below – Table 2), these are currently on request and are being developed to allow wider access to these logs from any authorised user, from any location.

- Specific User or User Group
- Date / Time
- General Activity / Specific Categories or Specific URL

To simplify the understanding of users activities online activity, the traffic is categorised by Smoothwall into pre-defined, recognisable category names. (See Table 2 for full category list).

Colwyn have configured the Smoothwall Cloud filter as per section 136 in the KCSIE Statutory guidance for schools and colleges released on 1 September 2023, addressing the following categories:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **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/>)

Figure 2 below shows examples of the test reports from testfiltering.com. This confirms compliance with the DFE’s filtering and monitoring standards in schools (March 2023).

Figure 1:

From: noreply@smoothwall.com <noreply@smoothwall.com>
Sent: 31 August 2023 5:00 PM
To: Safe Guarding Lead <safeguardinglead@school.co.uk>
Subject: New Safeguarding Alerts for studentuser@school.co.uk



¹ Safeguarding Alerts have been created for the user studentuser@school.co.uk. All of the individual alerts have been bundled together for you to view in the Alert Details section.

User Details:

Username: studentuser@school.co.uk
Local Groups: Trust - School Student Users
Serial Number: XXX111XXX111XXX
Tenant Name: XXX Academy
Tenant ID: 01180f6b-00e7-437b-91b8-9cd7528ff174

Alert Details:

Date/time: Thu Aug 31 2023 16:51:47 GMT+0100 (British Summer Time)
Theme: Adult content
Level: 7
Blocked: True
Search terms:
URL: <https://sex.com/>
Categories: Adult Sites,Pornography

Figure 2:

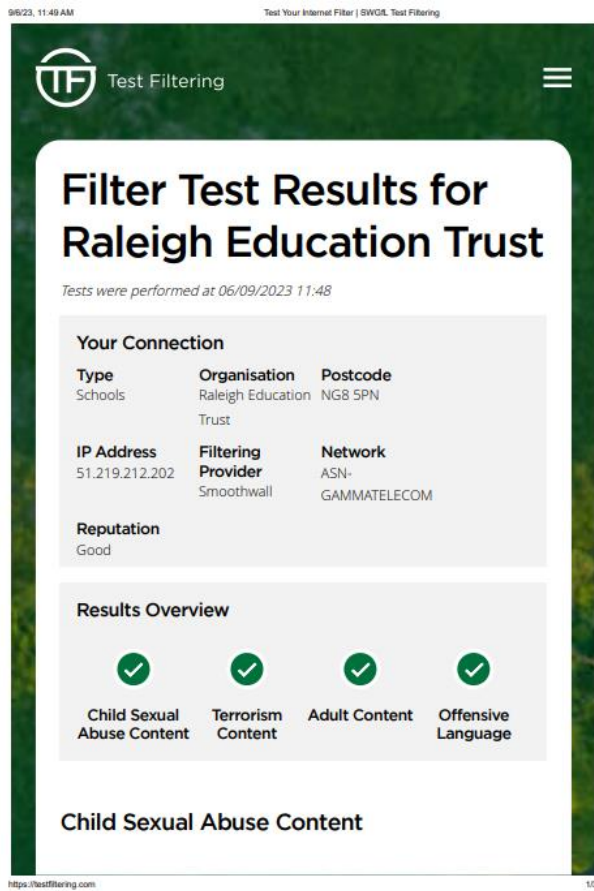


Figure 3:

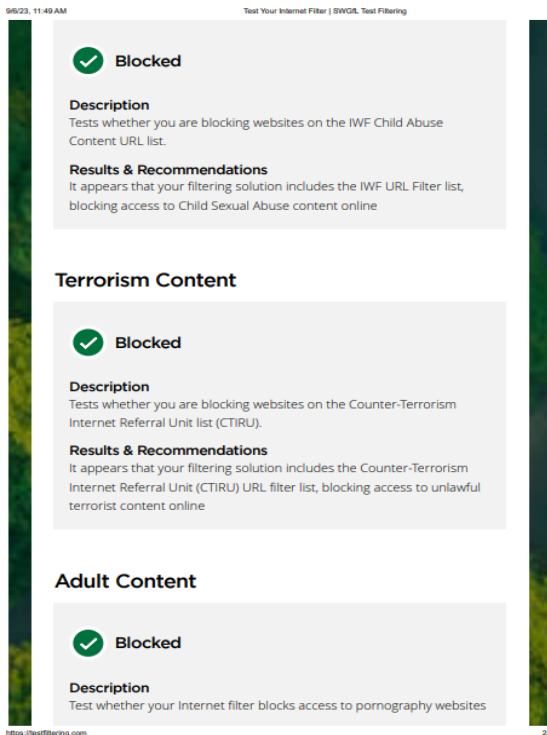


Figure 4:

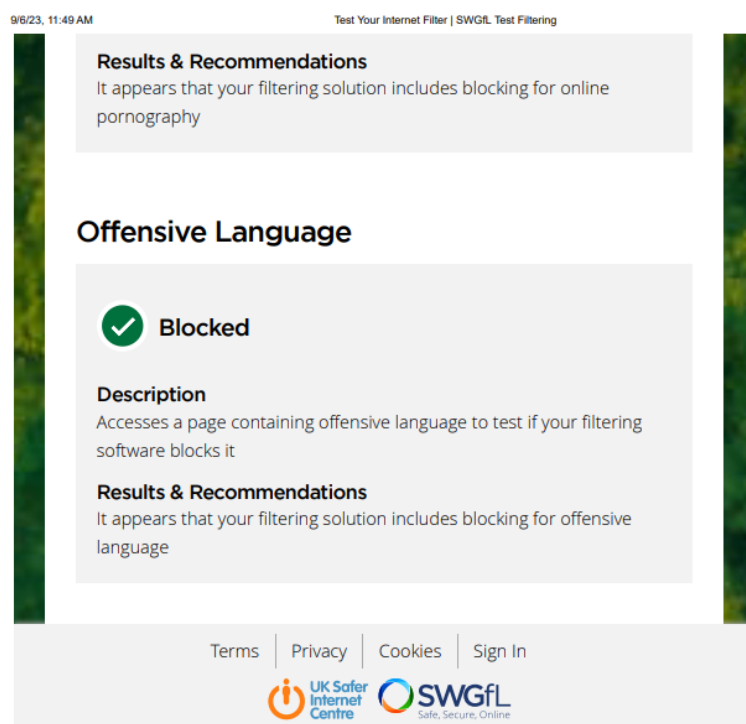


Table 2 – Category List (Subject to change).

Name	Example URL	Description
Legal & Liability Issues		Sites which could cause legal or liability issues
Child Abuse		Child abuse keywords contributed by the IWF
Drugs	www.weedguru.com	Sites pertaining to the sale, manufacture, promotion or use of recreational and prescription drugs
Intolerance	www.stormfront.org	Sites related to or promoting intolerance of any kind
Piracy and Copyright Infringement		Sites containing pirated copyrighted material for illegal download or streaming
Self Harm	www.sanctioned-suicide.org	Sites relating to self-harm, suicide and eating disorders
Pornography	www.pornhub.com	Sites dedicated to Pornographic content, whether audio/visual or textual
Terrorism		Sites provided by the Office of Security and Counter-Terrorism branch of the UK Home Office, containing pro-terrorism material
Violence	www.hockeyfights.com	Sites dedicated to violence, whether this is through sport or bullying
Adult Themes		Sites which may be unsuitable for a younger audience.
Abortion	optionsforabortions.com	Sites which refer to abortion, including "pro-life" and "pro-choice".
Adult entertainers		Use in conjunction with search term filtering to prevent pornographic web searches.

Adult Sites	www.urbandictionary.com	Content which is primarily adult in nature, content such as bad language or adult jokes, but not pornography.
Alcohol and Tobacco	www.guinness.com/	Sites pertaining to the use, sale, production and promotion of alcoholic drinks and tobacco (including e-cigarettes)
Body piercing and Tattoos	www.tattoos.com	Sites which promote, sell, advertise or discuss any body modification such as piercing and tattoos.
Criminal Activity	www.myfakeid.biz	Sites providing either instruction or tools facilitating illegal activity, such as lock picking, fake IDs and fraud.
Fireworks	www.fireworks.us	Purchase and manufacture of fireworks & pyrotechnic devices
Gambling	www.888.com	Sites providing gambling and gambling related services, casino's, sports betting etc..
Gore		Sites describing or displaying gory content.
Inappropriate/Vulgar Search Terms		Contains lists of Inappropriate/Vulgar/Swear words, only search terms, no content or URLs
Naturism and Nudism	www.clothesfree.com	Sites that contain nudist pictures and/or promote a nudist lifestyle
Non-pornographic Nudity	parkerpfister.com	Sites containing nudity that is not pornographic, e.g artistic nudity
Provocative Images	www.yummylook.com	Sites which contain pictures of intimate, alluring, revealing attire or other types of suggestive clothing, such as lingerie and swimsuits.
Restricted to Adults	www.rtalabel.org	Category containing the "Restricted to Adults" special tag; see http://www.asacp.org/
Sexuality Sites	www.lovepanky.com	Content based primarily on sexuality which may be unsuitable for a younger audience.
Weapons : Hunting and Sporting	www.thehuntinglife.com	Hunting and target shooting weapons.
Weapons : Military	www.nps.gov/spar	Sites describing weapons of war, including those in a historical context.
Weapons : Personal Weapons	www.gunsite.com	Sites discussing and/or selling of weapons, including firearms, blades, explosives and incendiaries.
Business and Corporate		Businesses and organisations, including government and non-profits.
Agriculture	masseyferguson.com	Sites related to agriculture - Machinery, livestock, crops
Business and Corporate	www.abc.xyz	Sites for businesses and commercial organisations, where the organisation provides paid for goods or services.
Charity and Non-profit	www.christianaid.org.uk	Charity and non-profit organisations
Crowdfunding	patreon.com	URLs of sites that their primary business is to raise capital for a project or venture via crowdfunding
Government	www.gov.uk	Government websites and websites related to governmental organisations
Household Utilities	www.britishgas.co.uk	Gas/Water/Electricity utilities websites, including phone & Internet
Law	www.lawsociety.org.uk	Lawyer/Solicitor/Barrister websites, law societies and sites whose whole theme is Law

Travel and Transport Services	www.nationalrail.co.uk	Information or booking sites related to transportation such as trains, taxis, or airlines
Entertainment		Entertainment, sport and online games
Books	www.lrb.co.uk	Sites selling, reviewing or discussing books or audio books in any format
Celebrity	www.perezhilton.com	Sites relating to any celebrity media, fan sites or news
Computer Games	www.ign.com	Sites related to computer games but not in browser playable games
Desktop Customisation	www.screensavers.com	Sites providing screen savers, wallpapers, desktop themes and similar content
Events	www.chicagothemusical.com	Sites that promote and discuss live events e.g. live dramatic/theatrical productions and festivals
Graphic novels	www.tokyopop.com	Graphic novels, Manga, Anime, and other illustrated works, excluding Hentai as this is Pornography
Jokes and Humour	www.ajokeaday.com	Sites dedicated to humour, including jokes, video, amusing images and satire
Magazines	www.horsemagazine.com	Sites selling, reviewing or discussing magazine content, printed or online
Movies and Film	www.imdb.com	Movie sites, reviews and discussion
Museums and Art galleries	www.vam.ac.uk	Sites that promote, exhibit, and/or display works of art or objects of historical and or cultural significance
Music	www.lyrics.com	Sites that discuss, promote/market and distribute music. Including fan sites, lyrics sites, playlist sites, artist and musical subjects sites
Online Games	www.miniclip.com	Sites providing games that can be played in a browser
Radio and TV	www.radiotimes.com	Non-news related radio and television, including radio streaming sites
Sport	www.eurosport.co.uk	Sites discussing or promoting any sport, including sports team homepages
File and Image Hosting		Sites which provide file hosting services.
File Hosting	www.mega.io	Sites that offer online file storage services on remote servers for backup or exchange purposes
Image Hosting: Moderated	www.photobucket.com	Sites that provide image/gif hosting services that are vetted or controlled with a conditions of use policy or moderated by humans
Image Hosting: Unmoderated	www.imgur.com	Sites that provide image/gif hosting services that include potentially pornographic or otherwise offensive content
Finance		Finance related sites, including banks and other financial service providers.
Cryptocurrency	www.bitfinex.com	Cryptocurrency websites
Financial Services	www.hsbc.com	Finance sites including investment advice, but not Online Banking portals
Online Banking	www.onlinebanking.natwest.com	Sites providing online banking access, or online credit card management
Payday Loans	www.cashasap.co.uk	Online providers of "Payday Loans"; short term cash loans typically with high rates of interest

IT & Technical		Sites relating to computing, technology and the Internet.
Collaboration Software	www.lucidchart.com	Sites that allow collaboration on documents/projects via shared link/software
Computing	www.slashdot.org	Sites related to computing but not games. e.g programming languages
DNS over HTTPS	dns.google	Subdomains/URLs used to facilitate the use of DNS over HTTPS
Games Consoles	www.playstation.com	Sites that provide authentication for, and content used in, games consoles
Microsoft Office 365	www.office.com	Domains required for Microsoft Office 365 to function.Warning: Includes live.com, msn.com and outlook.com
Mobile Apps : ClassDojo App	www.classdojo.com	URLs used by the ClassDojo App
Mobile Apps : Covid-19 Exposure Notification Apps		Mobile applications developed by public health authorities which use the Covid-19 Exposure Notification System developed by Google and Apple
Mobile Apps : Emile Education	https://emile-education.com	
Mobile Apps : Facebook App	www.facebook.com	URLs used by the Facebook Mobile App
Mobile Apps : Snapchat App	www.snapchat.com	URLs used by the Snapchat Mobile App
Mobile Apps : TikTok APP	tiktok.com	Domains and URLs used by the TikTok Android and iOS mobile application
Mobile Apps : Twitter App	www.twitter.com	URLs used by the Twitter Mobile App
Mobile Apps : WhatsApp	whatsapp.com	Used to allow or block the WhatsApp mobile application
Mobile/Cell Phones	www.o2.co.uk	Sites providing content about mobile/cell phones, reviews, ratings, providers etc...
Peer-to-peer Networking	www.1337x.to	Peer-to-peer network sites
Remote Desktop	www.teamviewer.com	Sites offering remote desktop and remote administration software tools
Software : Adobe Creative Cloud		URLs/IPs necessary for Adobe Creative Cloud to function properly
Software : AEM Web Portal		IP and URLs that are used by AEM (Autotask Endpoint Management)
Software : Google Drive	drive.google.com	URLs used by Google Drive/Docs/Sheets/Slides
Software : Google Meet	meet.google.com	Domains and URLs used by Google Meet
Software : GoTo Software Suite	www.gotomypc.com	Contains URLs for GoTo products (GoToMeeting, GoToWebinar, GoToTraining, GoToAssist, GoToMyPC, and OpenVoice)
Software : Hudl App	www.hudl.com	Domains/URLs used by the sports APP Hudl
Software : Lightspeed MDM	lsmdm.com	Domains and URLs used by Lightspeed's Mobile Device Management software

Software : Loom	loom.com	URLs necessary for Loom Screen Recording Software to work
Software : Senso		Doamins used by the Senso platform
Software : Skype	www.skype.com	Domains and IPs that are used by Skype
Software : youHQ	https://www.youhq.co.uk	Domains, URLs, and YouTube videos used by the youHQ school wellbeing platform.
Software : Zoom	www.zoom.us	List of URLs & IPs provided by Zoom's KB article
Web hosting	www.godaddy.com	Sites which offer domain names and web hosting services
Webmail	mail.google.com	Sites dedicated to email/webmail
What's my IP services	www.myip.com	Sites and services which display your public IP address
Information and Reference		Informational sites and reference materials
Academic institutions	www.harvard.edu	Sites of schools, universities, colleges and other learning centres
AI Tools	openai.com	General AI (AGI) tools are a set of software and technology that aims to simulate or replicate human-like intelligence across a wide range of tasks. These tools are designed to be flexible, adaptable and able to learn and improve on their own. They can be used for autonomous vehicles, chatbots, and virtual assistants. Examples include machine learning frameworks, NLP libraries and deep learning architectures.
Education and Reference	www.sparknotes.com	Sites that provide materials and information that aid in learning
Mapping	google.com/maps	Sites which provide geographical mapping services including those that promote or provide opportunity for travel planning
News	www.bbc.co.uk/news	Sites whose primary aim is to present local, national, or international news, or news relating to a specific topic.
Plagiarism	www.ukessays.com	Sites offering paid help and/or pre-written homework material for students
Politics	labour.org.uk	Sites belonging to a Political party or wholly political based sites
Sex Education	www.sexeducationforum.org.u k	Educational sites relating to sexual activity including reproduction, contraception and safe sex
Translation	translate.google.com	Sites which provide translation services, such as blocks of text or providing entire site translation
Weather	www.weather.org	Sites dedicated to weather information and forecasts
Wikipedia: Editing		Block this category to deny Wikipedia changes and Wikipedia logins.
Lifestyle		Various inoffensive yet non-work-related sites
Clothing Accessories	&www.tiffany.com	Sites selling, promoting and discussing clothing, shoes, jewellery and fashion
Food and Dining	www.snackworks.com	Sites relating to food reviews, recipes, restaurants and catering

Gardening	www.crocus.co.uk	Sites dedicated to gardening as a hobby, selling gardening products or reviewing gardening methods/techniques
Health and Fitness	puregym.com	Sites dedicated to health and fitness, gyms, fitness blogs, health sites
Household and DIY	www.diynot.com	Sites dedicated to to DIY projects, tools and household content
Online Auctions	www.ebay.co.uk	Online auction sites where auction style sales are carried
Online Shopping	www.sainsburys.co.uk	Sites where purchases can be made, of any kind
Parenting and Baby	www.mamasandpapas.com	Sites providing information or products for parenting, pregnancy, babies and infants
Pets	www.petsathome.com	Sites selling or discussing pets or pet related goods
Real estate and Property	www.realtor.com	Sites that discuss, promote/market and provide information on renting, buying, or selling real estate or properties
Religion	www.newchristian.com	Sites where the main theme/content is religion
Time-wasting	www.isitchristmas.com	Unproductive sites popular with children
Toys and Games	www.thetoystore.com	Sites which promote, discuss and sell toys and games
Vacations	www.kayak.co.uk	Sites related to travel and holidays
Vehicles and Motoring	www.harley-davidson.com	Sites which advertise, promote, discuss and offer information on vehicles and automobiles
Wedding	www.weddingplanner.co.uk	Sites discussing weddings or selling wedding related items or services
Malware and Hacking		Hacking, warez and phishing sites, including sites containing information on how to bypass web filters
Hacking	www.kitploit.com	Sites with the main theme of hacking/cracking, regardless of "whitehat" or "black-hat"
Internationalised Domain Names	www.xn--strmsel-c1a.se	Domains that include non-ASCII characters which are translated to punycode
Malware and Phishing		Sites hosting viruses, malware, adware, spyware or trojans
Web Proxies	www.proxysite.com	Web proxy sites and other tools designed to circumvent filtering
Medical	www.nhs.uk	Medical and childcare sites
Medical Information	www.nhs.uk	Sites containing content about health and medical matters
Multimedia		Audio/video, radio, peer-to-peer and other multimedia sites
Amazon Prime	www.amazon.com/PrimeVideo	Amazon Prime instant video and Amazon Prime music
Audio and Video	www.vimeo.com	Sites providing audio or video downloads or streaming
BBC iPlayer	www.bbc.co.uk/iplayer	Domains and URLs for the BBC iPlayer service
Disney+	disneyplus.com	Sites used by Disney's streaming service Disney+ (DisneyPlus)

iTunes	www.apple.com/itunes	Domains and URLs for Apple's iTunes service
ITV Player	www.itv.com/hub/itv	Domains and URLs for the ITV Player service
Live Streaming	www.livestream.com	Domains and URLs that stream live video
Netflix	www.netflix.com	Domains and URLs for Netflix
Spotify	spotify.com	Domains and URLs used by the Spotify client and Web app
Vimeo	vimeo.com	URLs used by Vimeo, to be used with Force Mature content filter content modification
YouTube	www.youtube.com	Domains and URLs for YouTube
YouTube Allowed Videos and Playlists		Allowed YouTube video and playlist IDs
YouTube HD streaming		Domains and URLs for high definition streams from YouTube
Search Engines		Search Engines
Google Instant Previews		Thumbnail previews of Google web search results
Google Search		URLs used by the Google search engine
Image Search	images.google.co.uk	URLs used for image search
Job Search	www.monster.com	Sites for job search
Question & Answer	www.wikihow.com	How To, instructional and Q&A sites
Reverse Image Search	www.tineye.com	Reverse image search engines which offer query-by-image and image similarity functions

Search Suggestions		Disables automatic search suggestions on Google, Bing, Ask and YouTube search engines
Secure Search	www.google.com	SSL encrypted search services
Web Search	www.google.com	Sites providing web search functionality
Web Search POST		Search engines that use the body of POST requests to contain search terms
Social Media		Social networking, dating and chat sites
Blogs	www.blogspot.com	Sites hosting blog content of any kind
Dating and Companionship Sites	www.match.com	Domains and URLs that provide dating and companionship services
Discussion Forums	www.edugeek.net/forums	Sites dedicated to discussion forums, e.g. phpBB
Facebook	www.facebook.com	Domains and URLs for the Facebook network
Facebook: Posts & Updates		Block this category to deny Facebook changes such as posts, comments, likes, uploading of photos, videos or notes. Requires HTTPS interception
Instagram	instagram.com	URLs used by Instagram
Instant Messaging VoIP and Web Conferencing	www.trillian.im	Sites which contain messenger clients and web-based messaging sites, as well as any form of Voice over IP based chat service
Social Networking Sites	www.facebook.com	Social Networking sites

Twitter: Updates		Block this category to deny Twitter changes such as tweets, retweets, follows, posting of photos, videos or account changes. Requires HTTPS interception
Web Infrastructure		Web infrastructure and miscellaneous domains.
Adverts	ads.whatsonstage.com	Advert servers and advert URLs
APIs & Web Libraries	api.twitter.com	Domains and URLs used by APIs and web libraries
Connect for Chromebooks	googleusercontent.com	Domains and URLs used for Google's service Connect for Chromebooks
Content Delivery	www.akamai.com	Content Delivery Networks and supplementary infrastructure servers for various existing sites
Internet Speed Tests	www.speedtest.net	Public web services used to measure the speed of an internet connection
Parked Domains	sedoparking.com	Inactive web domains "parked" by a registrar, advertiser or domain owner
Smoothwall Products		This category contains the Domains that the Smoothwall Suite uses.
Software Updates	windowupdate.microsoft.com	Domains used to download software updates
SSL / CRL	crl.verisign.com	Support domains for SSL services including Certificate Authorities, Certificate Revocation Lists, OCSP and Extended Validation servers
Transparent HTTPS incompatible sites		Sites used by clients which do not support HTTPS server name indication (SNI)
URL Shortening	bit.ly	Sites which provide a URL shortening and forwarding / link service
User tracking and Site stats	doubleclick.net	Sites known to track visitor statistics for analytics and reporting purposes