

GNSA Multi Academy Trust

Safeguarding and Child Protection Policy

2020 - 2021



Updated	Next Review	Reviewed By	Ratification
January 2021	September 2021	Safeguarding Team	Board of Directors

Any reference in this policy to **parents** means;

- All natural, parents whether they are married or not
- Any person who has parental responsibility for a child or young person
- Any person who has care of a child or young person i.e. lives with and looks after the child

MAT means Multi Academy Trust

This policy applies to students/pupils under the age of 18 years.

This policy has been updated in line with the new 'Keeping Children Safe in Education' guidance January 2021 (post EU exit) and in light of COVID19.

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1. Introduction

This is a **statutory document** which promotes and supports the vision and values of Guru Nanak Multi-Academy Trust.

Vision: To provide an outstanding learning environment which challenges all of us to achieve our full potential and to continually share our knowledge and skills with the local and global community.

Values: The values of Guru Nanak Multi Academy Trust are encapsulated by the **SHARE** acronym. These values are at the heart of everything we do and describe the qualities our students/pupils and staff value most- Service to others, Humility, Achievement, Respect and Equality.

The purpose of this policy is to inform staff, parents, volunteers and Directors about the school's responsibilities for safeguarding our students/pupils, as well as to provide a clear understanding of how these responsibilities should be carried out.

Safeguarding and promoting the welfare of children is defined in the updated 2020 Keeping Children Safe in Education guidance as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Core Safeguarding Principles

- It is a whole school responsibility to safeguard and promote the welfare of students/pupils, where all professionals should adopt a child-centred approach.
- All students/pupils regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All students/pupils have a right to be heard and to have their wishes and feelings taken into account.
- All staff understand safe professional practice and adhere to our code of conduct and other associated policies.
- All staff have a responsibility to recognise vulnerability in students/pupils and act on any concern in accordance with this guidance.

Child Protection Statement

Across the Guru Nanak Multi-Academy Trust we are committed to safeguarding and expect everyone who works in our school to share this commitment. We take all welfare concerns seriously and encourage our pupils/students to talk to us about anything that worries them. We will always act in the best interest of the child. We fully recognise our moral and statutory responsibility to safeguard and promote the welfare of all students/pupils and endeavour to provide a safe and welcoming environment where students/pupils are respected and valued. The procedures contained in this policy apply to all staff and directors and are consistent with those of the safeguarding procedures for children in the London Borough of Hillingdon and all other relevant local authorities.

Equality Statement

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

We give special consideration to students/pupils who:

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

Policy Aims

- To identify the Safeguarding Team and explain their roles
- To provide all staff with the necessary information and a clear understanding of their roles and responsibilities with respect to safeguarding and their child protection responsibilities
- To outline the process to follow where there is a concern about the safety and welfare of a student/pupil across the Multi-Academy Trust
- To set out expectations in respects of training
- To outline how complaints against staff will be handled
- To state how the implementation of this policy will be monitored, whilst ensuring consistency and good practice

2. Context and Statutory Framework

Context

The DFE issued non-statutory interim guidance on safeguarding during the coronavirus outbreak. This guidance has now been withdrawn as the government expects all settings to reopen for the new academic year in September, with full availability to all learners.

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

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is in relation to children
- Statutory guidance on the Prevent duty, which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

This policy is one of a series in the school’s integrated safeguarding portfolio. This policy should be read in conjunction with:

- Keeping Children Safe in Education (2021) -Part One & Annex A
- Staff Code of Conduct
- School’s Behaviour Policy
- School Attendance Policy

3. Safeguarding Roles and Responsibilities

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

Guru Nanak Multi-Academy Trust has a Safeguarding Team. The designated senior person responsible is set in accordance with a designated lead for each school.

Designated Safeguarding Leads (DSL):

GNSA Primary: Mrs Pavindeep Dhaliwal
 GNSA Secondary: Mr Thomas Perryman
 Nanaksar Primary School: Miss Anushka Chatur

The deputy designated persons across the Multi-Academy Trust are:

Designated Safeguarding Officers (DSO):

Mrs Kulwinder Grewal

Mr Malcolm Weiss
Mr Antonio D'Onofrio

The **Designated Director** responsible for child protection and safeguarding is:
Mr Peter Ryerson

All Staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance 2021, [Keeping Children Safe in Education](#), and review this guidance at least annually. **Appendix 1.**

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff behaviour policy/code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy/deputies, the behaviour policy, and the safeguarding response to students/pupils who go missing from education.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a student/pupil tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

The welfare and safety of students/pupils are the responsibility of all staff and **ANY** concern for a pupil's welfare **MUST** always be reported to the Designated Safeguarding Leads or Officers immediately.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether students/pupils are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

The Designated Safeguarding Leads (DSL)

The DSL members identified above are part of the senior leadership team and take lead responsibility for child protection and wider safeguarding. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When the DSL's is absent, the Deputy Safeguarding Officers identified above will act as cover.

The safeguarding team can be contacted through the school office (in all three phases). If a

specific member is not available, any other member of the team can be contacted. Contact details can be found in **Appendix 2**.

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

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

The DSL will also keep the Executive Principal informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL's are set out in their job description.

In recognising the need for the Multi-Academy Trust to offer out of hours support for staff the following advice is given;

- 'Imminent risk' child protection and safeguarding concerns should be directed to 999 with the appropriate emergency authority requested. (Imminent risk means that you deem the student/pupil to be at risk of immediate harm – in these cases do not put yourself or the student/pupil at any unnecessary risk. **Call 999 immediately** (if safe and feasible to do so) and follow the directions and advice given from the appropriate emergency service requested (dependant on the motivation for the call).
- Urgent child protection referrals, social care concerns, to be called in directly to Hillingdon's out of hours duty social worker on 01895 250111.
- General child protection and safeguarding concerns can also be directed to the NSPCC on 0800 800 5000.
- Please be sure to update the designated safeguarding lead, accordingly, at the earliest possibility.

All stakeholders are made aware of who the members of the Safeguarding Team are, through posters which are displayed around the school and inserted in student/pupil diaries – see **Appendix 3**.

See **Appendix 4** for the job description for the Designated Safeguarding Leads and Officers.

See **Appendix 5** for the job description of the Designated Governor/Director for Safeguarding.

The Board of Directors

The Board of Directors will approve this policy at each review, ensure it complies with the law and hold the Executive Principal to account for its implementation.

The Strategic Board will appoint a link Director to monitor the effectiveness of this policy in conjunction with the board. This is always a different person from the DSL.

The Chair of the Strategic Board will act as the 'case manager' in the event that an allegation of abuse is made against the Executive Principal, where appropriate. All Directors will read Keeping Children Safe in Education 2020.

The Executive Principal

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

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Ensuring the relevant staffing ratios are met, where applicable

Pupil Voice

It is essential that students/pupils have opportunities to express any worries or concerns, within a safe and comfortable environment. In addition to being aware of the identity of the MAT Safeguarding Team and speaking to staff members regarding concerns, pupils also have the opportunity to make disclosures online. 'Tootoot' launched across the Multi- Academy Trust in Autumn 2018, and is an online tool which enables pupils to share any concerns more discreetly. All concerns raised online are shared directly with the Safeguarding Team and actioned appropriately. Students/pupils also have posters displayed around the school and in their diaries to ensure that they know who they can speak to and assemblies are carried out frequently to remind them about the online and face to face platform that is available to them.

4. Safeguarding & Child Protection Procedures

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

If a student/pupil is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a student/pupil is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly.

If a student/pupil makes a disclosure to you

If a student/pupil discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the student/pupil they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the student/pupil's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL through TASC (online reporting tool) or using the school template. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so.

All members of staff across the Multi-Academy Trust know what to do if a student/pupil tells

them he/she is being abused or neglected. Members of staff know to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the Designated Safeguarding Leads and Officers. Members of staff know they must never promise a student/pupil that they will not tell anyone about a concern or allegation as this may ultimately not be in their best interests.

See **Appendix 6** for advice for staff on responding to safeguarding concerns and the procedure to follow. These are based upon the following principles: Listen / Ask / Stop - Tell - Take Seriously - Affirm - Refer.

Early Help

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.

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.

In line with the 2020 KCS guidance, a child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- as special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

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

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

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

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 student/pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a student/pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

Staff have a duty to identify pupils **at risk** of FGM in an attempt to safeguard students/pupils before it may occur, however the duty to report this to the police does not apply in cases where

a pupil/student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students/pupils.

If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

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

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

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

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

If you have a mental health concern

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

Staff will be alert to behavioural signs that suggest a student/pupil may be experiencing a mental health problem or be at risk of developing one. If you have a mental health concern about a student/pupil that is also a safeguarding concern, take immediate action and contact the DSL. If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

There are a number of provisions in place across Guru Nanak Multi Academy Trust **to support pupils/students with their mental health and wellbeing.**

- If a student is worried about themselves or someone else they are encouraged to approach a member of the safeguarding team or their Progress Leader. All members of the safeguarding team and Progress Leaders Level 3 trained.
- Students are also encouraged to use the school's safeguarding online reporting system 'Toot Toot' which is linked to the Progress Leaders and members of the safeguarding team.
- If the student is deemed to need further support they will be referred to a number of professional services which may be suitable. The Academy offers the services of a trained Counsellor who is an accredited member of the British Association for Counselling & Psychotherapy (BACP).
- In addition, the Academy also offers the services of a Drama and Play therapist who is an accredited member of the British Association of Drama Therapists (BADth) and a Children's Welfare Practitioner (CWP) from CAMHS.

- There are also a number of members of staff and a group of sixth form students have been trained by Mental Health First Aid England (MHFA) to work as a support group within the academy.
- For those students who have suffered loss or bereavement the Academy offers a specialist program called Seasons for Growth. This program supports students in understanding and responding to the issues they may experience as a result of death, separation, divorce or any other significant change or loss in their lives and is delivered by a trained member of the safeguarding team.
- The Primary Phase delivers 'Zones of Regulation' across all classes which is a systematic, cognitive approach used to teach self-regulation by categorizing all the different ways we feel and states of alertness we experience into four concrete colored zones. The framework provides strategies for pupils to become more aware of and independent in controlling their emotions.
- The Primary Phase primary phase also delivers a range of nurture groups to raise self-esteem and promote the development of social skills.

Concerns about a staff member, supply teacher or volunteer

Staff who are concerned about the conduct of a colleague towards a pupil/student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the student/pupil is paramount.

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 a student/pupil, speak to the **Executive Principal**. Please visit the admin office if you are unable to make contact with him for any reason. If the concerns/allegations are about the Executive Principal, speak to the **Chair of the Board of Directors**. See contact details in **Appendix 2**.

Staff who are the Subject of an Allegation

When an allegation is made against a member of staff, set procedures must be followed. A student/pupil may make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt in a timely manner, consistently and to be kept informed of its progress. Suspension is not mandatory, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

All of these allegations will be reported to the LADO (Local Authority Designated Officer) safeguarding lead. The full procedures for dealing with allegations against staff can be found in *Safeguarding Children and Safer Recruitment in Education*.

The school's Whistleblowing Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- An legal obligation has been breached
- There has been a miscarriage of justice

- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

5. Record Keeping

Staff will record any welfare concern that they have about a pupil/student on TASC (online recording tool). All staff will have access to their own log in details and a dashboard which enables them to complete the details of the disclosure, with the same information that has previously been written on the form. Once the disclosure has been reported online, the safeguarding team are immediately alerted to take action.

Where staff do not have access, this can be recorded on the Safeguarding/Welfare Concern Form (with a body map if injuries have been observed) and passed on without delay to a member of the Safeguarding Team – **Appendix 7**. Records should be completed as soon as possible after the disclosure/incident, signed and dated by the member of staff and the member of the Safeguarding Team.

If the situation is urgent you should take action immediately and complete the record after.

- All safeguarding concerns, discussions and decisions (and justifications for those decisions) will be recorded. If members of staff are in any doubt about recording requirements, they should discuss their concerns with Designated Safeguarding Lead or Officer.
- Safeguarding/Welfare Concern Forms are easily accessible from the school office and shared area on staff network/intranet etc.
- Safeguarding records are kept for individual students/pupils and are maintained separately from all other records relating to the students/pupils in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the Safeguarding Team in a locked facility and any electronic information will be password protected and only made available to relevant individuals. Forms to be marked, 'Restricted.' Safeguarding records are shared with staff on a 'need to know' basis only.
- Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage.
- All safeguarding records will be transferred in accordance with data protection legislation to the student/pupil's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.
- If a student/pupil for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- The Executive Principal will be kept informed of any significant issues by the Designated Safeguarding Leads.

The use of the School Premises by other Organisations

Where services or activities are provided separately by another external body using the school premises, the Executive Principal and Strategic Board will seek written assurances that the external organisation concerned has the appropriate policies and procedures in place with regards to Safeguarding Children and Child Protection.

6. Confidentiality

As part of meeting a child's needs, GNSA Multi-Academy Trust understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. In addition to this:

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

7. Training

All Staff

All school staff will receive appropriate safeguarding training, so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow. In addition all staff members will receive regular safeguarding and child protection updates (for example, via email and staff meetings), as required.

The Designated Safeguarding Leads & Officers will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Their training will be updated formally **every two years** but their knowledge and skills will be updated through a variety of methods at regular intervals, to keep up with any developments relevant to their role.

All members of staff will attend **annual safeguarding training**, in addition to the new Level 1 NSPCC online training that all staff must complete. All training has been updated in line with the new Keeping Children Safe (KCS) guidance and includes reference to the child protection policy; the behaviour policy; the staff code of conduct; the safeguarding response to children who go missing from education; and the role of the designated safeguarding lead.

During training, staff will be provided with a copy of this policy and policies that should be read in conjunction. In addition to this staff will be provided with **Part 1 of the new KCS 2020 guidance**

and informed of any changes, including Annex A.

All staff members will receive appropriate training to ensure they are aware of a range of safeguarding issues and are aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and peer on peer abuse can put children in danger. The staff training will also include school responsibilities, the school's child protection procedures, online safety, safe working practice and external reporting mechanisms.

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.

The Safeguarding Team will ensure that all new staff and volunteers (including temporary staff) are appropriately inducted in line with the school's internal safeguarding procedures and communication lines. A summary safeguarding information sheet is available at the reception desks (of all three phases), to be given to staff and volunteers to support this process.

All staff members will also be made aware of the schools expectations regarding safe and professional practice via the Code of Conduct and as part of the training process.

Staff members from across the MAT have been trained in safer recruitment, and records are maintained for all members.

The Designated Safeguarding Leads and Executive Principal will provide an annual report to the Strategic Board, detailing safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained.

8. Types of Abuse and Neglect

All staff across the Multi-Academy Trust should be aware of the definitions and signs and symptoms of abuse. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

For definitions and possible indicators and signs of abuse, see **Appendix 8** from the DfE guidance 'Keeping Children Safe in Education' 2020.

All members of staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label; in most cases multiple issues will overlap with one another. Members of staff are aware that student/pupil welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. Abuse and neglect can happen over a period of time, but can also be a one-off event. This can have major long-term impacts on all aspects of a student/pupil's health, development and well-being.

In addition to the four categories above, members of staff need to be fully alert to the specific safeguarding issues within the new KCS Guidance (2020), **Annex A** (page 82) (**Appendix 9**).

Further information on the specific areas of safeguarding can be found in **Appendix 10**.

As part of the update to the 'Keeping Children Safe in Education' guidance (2020), information was shared on the key areas below. See **Appendix 11 - 14** for additional information.

- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- Mental Health
- Child on Child Sexual Violence and Sexual Harassment
- Children Missing in Education

9. Peer on Peer Abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of students/pupils hurting other students/pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

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

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

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

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

10. Sexting

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

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

Initial review meeting

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

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

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

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

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

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

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

If at any point in the process there is a concern that a student/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.

11. Online Safety

Across GNSA Multi-Academy Trust, pupils/students are taught about safeguarding, including online safety, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Students/pupils are taught to recognise when they are at risk and how to get help when they need it.

The use of technology has become a significant component of many safeguarding issues, for example, technology often provides the platform that facilitates child sexual exploitation, radicalisation and sexual predation.

We will therefore ensure that appropriate filtering and monitoring systems are in place when students/pupils access school systems and internet provision. The use of filters is routinely monitored and updated and any breaches dealt with in accordance with school procedures.

The school will be careful to ensure that these systems do not place unreasonable restrictions on internet access or limit what students/pupils can be taught with regards to online teaching and safeguarding

We acknowledge that whilst filtering and monitoring is an important part of schools online safety responsibilities, it is only one part of our role. Students/pupils may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology.

We have due regard to the additional information and support set out in KCS 2020 and will ensure that the school has a whole school approach to online safety and has a clear policy on use of communications technology in school. Our policy also explains how we respond to online safety incidents, including support for parents and staff members.

As schools increasingly work online post COVID19, it is essential that our students/pupils are safeguarded from potentially harmful and inappropriate online material. Additional information to support staff in keeping children safe online (including when they are online at home) is provided in the 2020 KCS, Annex C (p 102).

12. Monitoring & Review

All school staff (including temporary staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/carers on the school website.

This policy has been written to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare. The policy forms part of our school development plan and will be reviewed annually.

The Safeguarding Team will review the policy following any updates to legislation, or any child protection concerns (including any learnings identified from serious case reviews), or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.

The policy will be monitored and reviewed by the MAT Safeguarding team and the Director responsible for safeguarding and approved by the Board of Directors.

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Appendix 1: DfE Guidance Keeping Children Safe in Education 2020 – Part 1

New guidance was released by the government in September 2020. It is essential for all staff to read Part 1 of this document (information for all school and college staff), which includes Annex A. Annex A has been updated and contains important additional information about specific forms of abuse and safeguarding issues.

PART 1 Contents: Safeguarding information for all staff: Page 3-16 Annex A: Page 17-31

The document will be shared during training sessions and can also be found online using the link below and will be on the staff intranet.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912593/Keeping_children_safe_in_education_part_1_Sep_2020.pdf


Appendix 2: Safeguarding Team Contact Details

Designated Safeguarding Lead	Pavindeep Dhaliwal	Pavin.dhaliwal@gnsa.co.uk
Designated Safeguarding Lead	Thomas Perryman	Tom.perryman@gnsa.co.uk
Designated Safeguarding Lead	Anushka Chatur	Anushka.chatur@nanaksarprimary.co.uk
Designated Safeguarding Officer	Antonio D'onofrio	Antonio.donofrio@gnsa.co.uk
Designated Safeguarding Officer	Kulwinder Grewal	Kulwinder.grewal@gnsa.co.uk
Designated Safeguarding Officer	Malcolm Weiss	Malcolm.weiss@gnsa.co.uk
Director for Safeguarding	Peter Ryerson	Peter.ryerson@gnsa.co.uk
Executive Principal	Rajinder Singh Sandhu	Rajinder.sandhu@gnsa.co.uk
Chair of Board of Directors	Arun Thakur	Arun.thakur@gnsa.co.uk


All staff can be contacted by telephone through the school office on 0208 5736085.

Appendix 3: Student/Pupil & Staff Safeguarding Posters


The GNSA Multi-Academy Trust SAFEGUARDING Team



Designated Safeguarding Lead
in the Secondary Phase is: **Tom Perryman**




Designated Safeguarding Lead
in Primary Phase is: **Pavin Dhaliwal**







Designated Safeguarding Lead
in Nanaksar Primary Phase is: **Anushka Chatur**

This school is committed to safeguarding and promoting the welfare of children and expects EVERYONE- all staff and volunteers to share this commitment. If you are concerned about a child's welfare, please report your concern and any observations or conversations heard to any of the Designated Safeguarding officers as soon as possible - on the same day. Do not conduct your own investigation. You can contact any of the Safeguarding Officers through the school office.

Designated Governor for Safeguarding
Mr Peter Ryerson






Designated Safeguarding Officers
Antonio D'Onofrio, Malcolm Weiss & Kulwinder Grewal







"Safeguarding is everyone's business"

The GNSA Multi-Academy Trust SAFEGUARDING Team






Mrs Dhaliwal




Mr Perryman

Designated Leads




Miss Chatur

Speak to us
we're here to
listen and help




Mr D'Souza


Designated Safeguarding Officers



Mr Weiss



Mrs Grewal



All Staff

'Your safety' is our Top Priority

Appendix 4: Job Description: Designated Safeguarding Leads & Officers

The Designated Safeguarding Leads have the overall responsibility for the day to day oversight of safeguarding and child protection systems in school. They will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role.

The Designated Safeguarding Team's training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods at regular intervals, at least annually, to keep up with any developments relevant to their role.

The Safeguarding Team consists of additional staff to deputise for the DSL, namely Designated Safeguarding officers. They have attended appropriate training which enables them to fulfil this role. Whilst the activities of the Designated Safeguarding Lead may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the Designated Safeguarding Lead and this responsibility will not be delegated.

It is the role of the Designated Safeguarding Lead to:

- Act as the central contact point for all staff to discuss any safeguarding concerns
- Maintain a confidential recording system for safeguarding and child protection concerns
- Coordinate safeguarding action for individual children
- Have an understanding of procedures in the London Borough of Hillingdon and other London Boroughs
- In the case of Children in Care, the DSL should have the details of the student/pupil's social worker (foster carer where applicable) and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- Liaise with other agencies and professionals in line with Working together to safeguard children
- Ensure that locally established procedures are followed and making referrals to other agencies, including Early Help and Specialist Children's Services (SCS) as necessary
- Represent, or ensure the school is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences)
- Manage and monitor the school's part in Early Help / Child in Need / Child Protection plans
- Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns
- Ensure all staff access appropriate safeguarding training and relevant updates
- Keeping written records of all concerns, ensuring that such records are stored securely
- Referring cases of suspected abuse to Children's Social Care or police as appropriate
- Notifying Children's Social Care if a child with a child protection plan is absent for more than two days without explanation

In addition to this, it is the responsibility of the Designated Safeguarding Officers to raise awareness:

- The designated safeguarding person should ensure the school or college's policies are known, understood and used appropriately.
- Ensure the MAT policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- Ensure the safeguarding and 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 MAT.
- Link with the Local Safeguarding Children's Board (LSCB) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where students/pupils leave the MAT, ensure the file for safeguarding and any child protection information is sent to any new school /college as soon as possible but transferred separately from the main pupil file.
- Schools should obtain proof that the new school/education setting has received the safeguarding file for any student/pupil transferring and then destroy any information held on the child in line with data protection guidelines.

Appendix 5: Job Description: Designated Governor/Director for Safeguarding

The Strategic Board must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training across the MAT are effective and comply with the law at all times.

The Director for Safeguarding is Mr Peter Ryerson.

The responsibilities placed on the Director for Safeguarding include:

- Ensuring that an effective child protection policy is in place, together with a staff code of conduct policy
- Ensuring staff are provided with Part One of Keeping Children Safe in Education (2020)
- Ensuring that staff induction is in place with regards to child protection and safeguarding
- Ensuring that all of the Designated Senior Persons (including deputies) should undergo formal child protection training every two years and receive regular (annual) safeguarding refreshers
- Prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- Ensuring that children are taught about safeguarding in an age appropriate way
- Ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.

The Strategic Board must also ensure that the school has:

- A child protection policy and procedures that are consistent with LSCB
- Requirements, reviewed annually and made available to parents upon request
- and available on the school's website
- Procedures for dealing with allegations of abuse made against members of staff including allegations made against the Executive Principal
- Safer recruitment procedures that include the requirement for appropriate checks
- A training strategy that ensures all staff receive child protection training, with arrangements to ensure that all new, temporary staff and volunteers are made aware of the school's arrangements for child protection.

If Directors request information about child protection data this should be made available to them.

Appendix 6: Procedure: Responding to Disclosures



Guru Nanak Multi Academy Trust

DISCLOSURES – WHAT TO DO

- 1. Listen** To the pupil/student.
Allow them to talk freely.

Ask “Can you tell me who it was?”
If they will not answer, do not push them or offer suggestions.

Stop Do not ask any more questions.
We are here to gather information, in order to make a referral, and not to investigate.
- 2. Tell** The pupil/student they are not to blame.
- 3. Take Seriously** What the pupil/student has said. We should not make judgments about the information given.
- 4. Affirm** *“I am glad you have told me. It was right to tell me. You have been brave and strong to tell me”.*
- 5. Refer** Tell the pupil//student you must tell other people who can help. Tell a members of the Safeguarding Team, who will make the decision whether to refer or not.
- 6. Put in writing** What the pupil/student has told you within 24 hours, by using the Safeguarding & Welfare Concern Form.

NEVER TELL A PUPIL/STUDENT YOU WILL KEEP A SECRET

Appendix 7: Safeguarding/Welfare Concern Form

Guru Nanak Multi Academy Trust Safeguarding & Welfare Concern Form 2020/21



IF THE SITUATION IS URGENT YOU SHOULD TAKE ACTION IMMEDIATELY AND COMPLETE THIS FORM AFTERWARDS

Completed by:

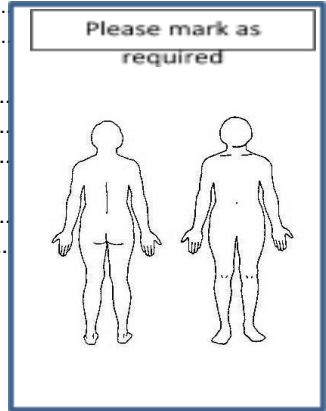
DATE: TIME:.....

Student/Pupil Name: Yr:

GNSA Primary GNSA Secondary Nanaksar

Reason for concern:

.....
.....
.....
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.....
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.....
.....



Signed:

To be filled in by a member of the MAT Safeguarding Team:

Action:

.....
.....
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.....
.....

Outcome:
.....
.....
.....
.....

Parents informed:

Safeguarding Team Member

Name: Signature:..... Date:.....

Appendix 8: Types & Indicators of Abuse

All staff in school should be aware of the definitions and signs and symptoms of abuse. There are four categories of abuse: Physical abuse, Sexual abuse, Emotional abuse and Neglect.

All members of staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label; in most cases multiple issues will overlap with one another.

Abuse and neglect can happen over a period of time, but can also be a one-off event. This can have major long-term impacts on all aspects of a child's health, development and well-being. The below definitions are from 'Keeping children safe in education' 2018.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities,

encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The warning signs and symptoms of child abuse and neglect can vary from child to child. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the student/pupil and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to a member of the Safeguarding Team.

A child who is being abused or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries
 - Show signs of pain or discomfort
 - Keep arms and legs covered, even in warm weather
 - Be concerned about changing for PE or swimming
 - Look unkempt and uncared for
 - Change their eating habits
 - Have difficulty in making or sustaining friendships
 - Appear fearful
 - Be reckless with regard to their own or other's safety
 - Self-harm
 - Frequently miss school or arrive late
 - Show signs of not wanting to go home
 - Display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
 - Challenge authority
 - Become disinterested in their school work
 - Be constantly tired or preoccupied
 - Be wary of physical contact
 - Be involved in, or particularly knowledgeable about drugs or alcohol
 - Display sexual knowledge or behaviour beyond that normally expected for their age
- (This is not an exclusive list and serves as a guide, there are other indicators)

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the professionals to decide how to proceed.

Staff must remember, it is their responsibility to report their concerns. It is not their responsibility to investigate or decide whether a student/pupil has been abused.

Appendix 9: Annex A

In addition to the four categories of abuse, Annex A of the updated Keeping Children in Safe guidance (2020) contains important additional information about specific forms of abuse and safeguarding. Please see the link below for the full document (page 82).

file:///media/fuse/drivefs-062c420673d43d43ab09e0274d0835b8/root/Keeping_children_safe_in_education_Sep_2020.pdf

- Children and the court system 83
- Children missing from education 83
- Children with family members in prison 83
- Child Criminal Exploitation (CCE) 84
- Child Sexual Exploitation (CSE) 84
- County lines 85 Domestic abuse 85
- Homelessness 86 So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage) 87
- FGM 88
- Forced marriage 89
- Preventing radicalisation 89
- The Prevent duty 90 Channel 90 Peer on peer/ child on child abuse 91
- Sexual violence and sexual harassment between children in schools and colleges 92
- Upskirting 94

Additional advice and support on the following areas can also be found on p94-96 of KCS 2020.:

file:///media/fuse/drivefs-062c420673d43d43ab09e0274d0835b8/root/Keeping_children_safe_in_education_Sep_2020.pdf

- Abuse 94
- Bullying 94
- Children missing from education, home or care 95
- Children with family members in prison 95
- Child Exploitation 95
- Drugs 96
- "Honour Based Abuse" (so called) 95
- Health and Well-being 95
- Homelessness 95
- Online (see also Annex D) 96

- ❑ Private fostering Private Fostering 96
- ❑ Radicalisation 96
- ❑ Upskirting 96
- ❑ Violence 96

Appendix 10: Specific Areas of Safeguarding

A-Special Educational Needs & Disabilities (SEND) and Vulnerable Groups

B-Child Sexual Exploitation (CSE)

C-Child Criminal Exploitation

D-Female Genital Mutilation (FGM)

E-Honour Based Violence

F-Preventing Radicalisation

G-Private Fostering

H-Forced Marriages

I-Anti-Bullying / Cyber-Bullying

A-Special Educational Needs & Disabilities (SEND) and Vulnerable Groups

We acknowledge that children with SEND can face additional safeguarding challenges. We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; children with SEND can be disproportionately impacted by things like bullying- without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

We recognise that some children are more vulnerable to abuse, neglect and additional barriers exist when recognising abuse for some children. To ensure all our students/pupils receive equal protection we will give special consideration to children who are;

- Disabled or have special educational needs
- Young carers
- Affected by parental substance abuse, domestic abuse, or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Living in temporary accommodation
- Living transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- Do not have English as a first language

GNSA Multi-Academy Trust will ensure that students/pupils with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon. The school will consider extra pastoral support for such pupils.

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of

actions used by staff that involve a degree of physical contact to control or restrain children. 'Reasonable' in these circumstances means using no more force than is needed. The use of force may involve either passive physical contact such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The school will not adopt a 'no contact' policy as this may leave staff unable to fully support and protect children and young people. The school will adopt a sensible policy which will allow and support staff to make appropriate physical contact. When using reasonable force to risks presented by incidents involving children with SED or disabilities or with medical conditions, schools will consider drawing up individual behaviour plans for more vulnerable children which will be agreed with parents/carers.

B - Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. *Statutory definition from the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017).*

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;

- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil of this Multi-Academy Trust, this will result in an immediate referral to Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted in accordance with the *London Child Protection Procedures*. This will determine how and when information will be shared with parents and the investigating agencies.

C - Child Criminal Exploitation & County Lines

Criminal exploitation of children 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.

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults;
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

A young person's involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person's lifestyle should be discussed with them. Some potential indicators of county lines involvement and exploitation are listed below:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls and/or having multiple handsets
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being.

If staff identify a student/pupil at risk of county lines exploitation, they should follow the schools procedures and share this information with the local authority social services. If you believe a person is in immediate risk of harm, you should contact the police.

D - Female Genital Mutilation (FGM)

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

Risk factors for FGM include:

- Low level of integration into UK society
- Mother or a sister who has undergone FGM
- Girls who are withdrawn from PSHE
- Visiting female elder from the country of origin
- Being taken on a long holiday to the country of origin
- Talk about a 'special' procedure to become a woman

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- Reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify the police when they discover that FGM appears to have been carried out on a girl under 18. **Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care.**

E - Honour-Based Violence (HBV)

Honour –based violence can be described as a collection of practices which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and /or honour. It encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

Honour-based violence might be committed against people who;

- Become involved with a girlfriend/boyfriend from a different culture or religion

- Want to get out of an arranged marriage
- Want to get out of a forced marriage
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

Where staff are concerned that a student/pupil might be at risk of HBV, they must contact the Designated Safeguarding Lead as a matter of urgency.

F - Preventing Radicalisation

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (The Prevent duty). Young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead. The Designated Safeguarding Leads have received training about the Prevent Duty and tackling extremism and are able to support staff with any concerns they may have.

We will refer students/pupils at risk of harm as a result of involvement or potential involvement in extremist activity to Hillingdon Multi Agency Safeguarding Hub (MASH). The MASH will share the referral details of new referrals with the Prevent lead police officer and LA Prevent coordinator at the point the referral is received. The referral will then be processed through the MASH multi agency

information sharing system and parallel to this the Prevent police officer will be carrying out initial screening checks. The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns.

In addition to this, across the Multi-Academy Trust we use the curriculum to ensure that our students/pupils understand how people with extreme views share these with others, especially using the internet.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values, supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

G - Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage). Great grandparents, great aunts, great uncles and cousins are not regarded as close relatives.

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 to do so is a criminal offence. The law requires that Hillingdon Council should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If we become aware of a child in a private fostering arrangement within Hillingdon, we will notify the council's Private Fostering team on 01895 556644. Although schools have a duty to 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.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored, 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.

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.

H - Forced Marriages

A forced marriage is a marriage in which one or both people do not, (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Forcing someone to marry is a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act.

A forced marriage is not the same as an arranged marriage which is common in several cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangements remains with the prospective spouses.

- Forced marriage is automatically handled as a child protection issue
- Staff must share information promptly when a student/pupil is at risk of forced marriage.
- Staff must understand the difference between breaking confidence (involving the student/pupil's family without consent) and sharing information with consent with other appropriate professionals to prevent the child or young person being at risk of significant harm.

The Designated Safeguarding Leads will share any relevant information with the Executive Principal and the police will be involved.

I - Anti-Bullying/Cyberbullying

Our MAT policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse. If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective the DSL will consider implementing child protection procedures.

Appendix 11: Child on Child Sexual Violence and Sexual Harassment

As part of the updated KCS (2020) guidance, Child on Child Sexual Violence and Sexual Harassment forms Part 5 of the document (Page 69). It is important that we as a school are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way.

Sexual violence and sexual harassment between children in schools can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff across the GNSA Multi-Academy Trust should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts.
- Dismissing or tolerating such behaviours risk normalising them.

The following information forms part of Annex A in KSC (2018), including the definitions below.

What is Sexual violence and sexual harassment?

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003/105 as described below:

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

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

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

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages, including, on social media; and sexual exploitation; coercion and threats.

The initial response to a report from a pupil/student is important. It is essential that all victims 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.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 23 in Part 1 of KCS. As is always the case, if staff are in any doubt as to what to do they should speak to the Designated Safeguarding Lead or a member of the MAT Safeguarding Team.

Appendix 12: Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

KCS 2020, Annex A, p9-10

- Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
- Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.
- In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator.
- The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Appendix 13: Mental Health

KCS 2020, Annex A, p11

- All staff should also be aware that 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.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.
- The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans.

Appendix 14: Children Missing in Education

Guru Nanak Multi Academy Trust recognises that all students/pupils, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

We are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zone, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of the school's procedures for unauthorised absences and children missing from education procedures, which forms part of the induction training.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contact numbers for parents/carers, which is in place through our SIMS system across all phases of the school. Parents are reminded to update the school as soon as possible if the numbers change.

Across the Multi-Academy Trust, the followings steps are in place to monitor attendance, led by the Attendance Officer and Senior Leadership Team:

- All pupils are entered on the admission register at the beginning of the first day on which the school has agreed that the pupil/student will attend the school. This register is kept up to date and checked for accuracy at least termly.
- If a pupil fails to attend the school, the school will undertake reasonable enquiries to establish the pupil's whereabouts and consider notifying the local authority at the earliest opportunity. Please also see the Attendance policy for school procedures.
- The school monitors pupils' attendance through the daily register. The school monitors attendance closely and addresses poor or irregular attendance. The school notifies local authorities of pupils who fail to attend regularly, or have missed five school days or more without permission and for whom no contact with home can be made.
- Pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil's new school (where applicable) and their expected start date.

In response to the guidance in Keeping Children Safe in Education (2020) the school has:

- Staff who understand what to do when children do not attend regularly.
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:

-leave school to be home educated -move away from the school's location -remain medically unfit beyond compulsory school age -are in custody for four months or more (and will not return to school afterwards); or -are permanently excluded.

Appendix 15: Safer Recruitment

Across Guru Nanak Multi Academy Trust, we will record all information on the checks carried out in the school's online single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New Staff

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing Staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and Third-Party Staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/Student Teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors/Directors

All Directors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

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

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

Keeping Children Safe in Education, January 2021 update (Post EU Exit) - [click here](#).

The updated guidance references the European Economic Area (EEA) regulating authority teacher sanctions or restrictions, where from 1st January 2021 the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states.

At GNSA Multi-Academy Trust we will ensure that individuals who have lived or worked outside the UK undergo the same checks as all other staff (as set out in paragraphs 154 and 160 of the guidance). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK.

In addition, we will make any further checks appropriate so that any relevant events that occurred outside the UK can be considered, which may include criminal records checks for overseas applicants and/or obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Where this information is not available we will seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

Further information can be found in DfE Guidance: Recruit teachers from overseas - [click here](#).