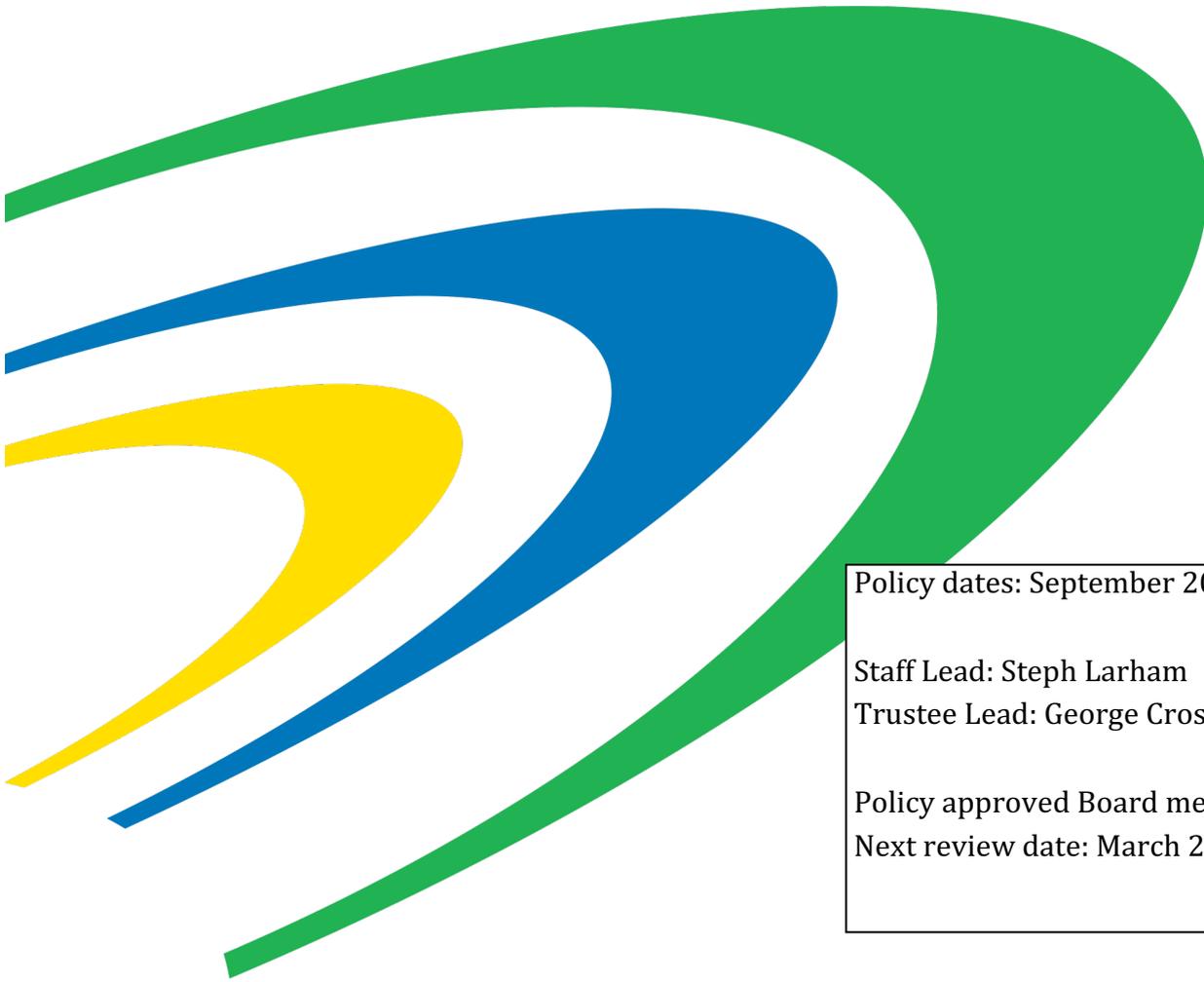


Safeguarding and Child Protection Policy

2020-21



Policy dates: September 2020 – August 2021

Staff Lead: Steph Larham

Trustee Lead: George Crosbie

Policy approved Board meeting June 2020

Next review date: March 2021

TBAP AP AND SPECIAL ACADEMIES



LONDON



COURTYARD



LATIMER



BEACHCROFT



BRIDGE



16-19



CAMBRIDGE



UNITY



OCTAVIA



CAMBRIDGESHIRE



Aims and responsibilities

The TBAP Trust fully recognises the responsibility it has under section 157/175 of the Education Act 2002 to have arrangements in place to safeguard and promote the welfare of children.

This responsibility is more fully explained in the statutory guidance for schools and colleges 'Keeping Children Safe in Education' (September 2020). All staff must be made aware of their duties and responsibilities under part one of this document, which are set out below.

Staff should read the above document together with 'Annex A' of 'Keeping Children Safe in Education' (September 2020) and 'What to do if you're worried a child is being abused: Advice for practitioners' (March 2015).

Through their day-to-day contact with pupils and direct work with families all staff in school have a responsibility to:

- Identify concerns early to prevent them from escalating;
- Provide a safe environment in which children can learn;
- Identify children who may benefit from early help;
- Know what to do if a child tells them he/she is being abused or neglected;
- Follow the referral process if they have a concern.

This policy sets out how the school's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at our academies. Our policy applies to all staff, paid and unpaid, working in the school including board members. Learning support professionals, mid-day supervisors, office staff as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the school and its governors.

TBAP Trust academies and services aim to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

This policy relates to all TBAP Academies. The geographical pen portraits below give an overview of each setting;

TBAP Beachcroft - Westminster

Westminster is an area of central London within the City OF Westminster part of the West End on the north bank of the River Thames. It is to the west of the ancient City of London, directly to the east of the Royal Borough of Kensington and Chelsea, and its southern boundary is the River Thames. Westminster's concentration of visitor attractions and historic landmarks, one of the highest in London, includes the Buckingham Palace, Westminster Abbey and Westminster

Cathedral. Bounding Westminster to the north is Green Park a Royal Park Of London. Much of the borough is residential, and in 2008 it was estimated to have a population of 236,000. A study in 2017 by Trust for London and The New Policy Institute found that Westminster has the third-highest pay inequality of the 32 London boroughs. It also has the second-least affordable private rent for low earners in London, behind only Kensington and Chelsea. The ethnic population is mainly White British (48%), with Black, Asian, and minority ethnic making up 27% of the population. Situated on Finchley Road, 3 minute walk from St Johns Wood Station the school shares a campus with Harris Academy and George Elliot Primary School.

Concerns: Gangs, CSE, County Lines

The Bridge: ICM, 16-19 AcAP, The Courtyard – Hammersmith & Fulham

Hammersmith & Fulham is one of 13 inner London boroughs and is situated in the centre-west of London on the transport routes between the City and Heathrow airport. It is bordered by six London boroughs: Brent to the north; Kensington and Chelsea to the east; Wandsworth and Richmond-Upon-Thames to the south and Ealing and Hounslow to the west, it is traversed by the east-west main roads of the A5 great West Road and the A40 Westway. Excluding the City of London, it is the third smallest of the London boroughs in terms of area, covering 1,640 hectares. There is a strong correlation between high concentrations of social rented housing in the borough and deprivation. In 2010, the borough was ranked 55th most deprived local authority area in the country and there are significant pockets of deprivation, particularly in the north of the borough. Four of the borough's Super Output Areas (SOAs) are within the top 10% most deprived nationally. Two of these comprise major public sector housing estates. According to the 2001 census Hammersmith and Fulham has a population of 165,242. 60% of the borough's population is White British 20% white non-British (among which are large French, Polish, Portuguese and Irish communities), 5% black Caribbean 8% black African with various other ethnicities (including Indian, Pakistani, Bangladeshi and Chinese) making up the remaining 11 percent. The borough has the second-highest proportion of single adults of any borough in England and Wales (55%), and a higher than average proportion for the London area of young adults aged 20–29 (24%).

Deprivation and low household incomes result in high levels of child poverty. In 2010, levels of child poverty were much higher in London than any other region. For Hammersmith and Fulham, 31% of the borough is within the 10% most deprived areas nationally. In 2010, 35.5% of nursery and primary school children and 21.9% of stated-funded secondary school children were entitled to free school

Concerns: Gangs, CSE, County Lines, Domestic Violence, Neglect, Child Protection

TBAP Latimer AP Academy: Kensington & Chelsea

The Royal Borough of Kensington and Chelsea is an inner London borough with royal status. It is the smallest borough in London at just over 4.7 square miles, and the second smallest district in England; it is one of the most densely populated administrative regions in the United Kingdom. It includes affluent areas such as Notting Hill, Central Kensington, South Kensington, Chelsea, and Knightsbridge. The borough is immediately west of the City of Westminster and east of the London Borough of Hammersmith and Fulham. Property prices and private sector rents are the highest in the country.

The population is multicultural and multilingual. At the 2011 census, the borough had a population of 158,649 who were 71% White, 10% Asian, 5% of multiple ethnic groups, 4% Black African and 3% Black Caribbean. The schools in the borough have more than twice the national

rate of pupils from disadvantaged backgrounds, and while seven wards in Kensington and Chelsea are among the least deprived nationally, two wards are among the ten percent most deprived in England. Further investigation indicates a 12-year gap in life expectancy between the affluent wards of Chelsea (Royal Hospital, Hans Town) and the most northerly wards of North Kensington (Golborne, Dalgarno), which have high levels of social housing and poverty

Concerns: Child Sex Exploitation (CSE), Knife Crime, County Lines, Grooming and Gangs.

TBAP New Horizons – Warrington North West

Warrington is an old market town in Cheshire, The Borough is made up of 22 wards in the North West region. It is located between Liverpool & Manchester with direct access to the M56, M6 and M62. It has a population of 209,700, Of the 209,700 people in Warrington 21.3% (44,646) are children aged 0 to 17. Approximately 11.5% of the children (aged under 17) living in Warrington are living in poverty. Census shows that 95.9% of the resident population in Warrington are white and 4.1% are non-White.

Concerns: Anti-social behaviour, Drug use, County lines

TBAP Octavia – Wisbech

Fenland is a local government district in Cambridgeshire, England. The town lies in the far north-east of the county, bordering Norfolk and only 5 miles (8 km) south of Lincolnshire. Historically, the town stood at the crossing of two Class A roads: from Peterborough to King's Lynn (A47) and from Ely to Long Sutton (A1101). The A1101 now crosses the river at the newer 'Freedom bridge' taking some traffic away from the older 'Town Bridge'. The A47 now bypasses the town. The old part of the A47 inside the town (Lynn Rd and Cromwell Rd) is now the B198. Its council is based in March, and it covers the neighbouring market towns of Chatteris, Whittlesey and Wisbech. The district covers around 500 square kilometres (210.99 square miles) of mostly-agricultural land in the extremely-flat Fens. It had a population of 34,000 in 2016 and 6,748 were aged under 18. The 'Migrant and Refugee Needs Assessment for Cambridgeshire, 2016 revealed numbers arriving in Fenland have quadrupled in the last 10 years.

Fenland has a high level of deprivation compared to the Cambridgeshire average. A local Index of Multiple Deprivation 2015 report indicated that the majority of Fenland wards are within the 1st deprivation quintile, and 25% of wards (6 wards) fall within the least deprived 80% of wards within Cambridgeshire. About 21% (3,700) children live in low income families. GCSE attainment is worse than the England average. Hospital stays for alcohol specific conditions in under 18's is 37.6 per 100,000 population, similar to the England average. The rate of self-harm related hospital stays is 310.7 per 100,000 population, worse than the England average.

Concerns: County lines, CSE and CE, Violence and Sexual Offences, Anti-Social Behaviours: Criminal damage and arson

TBAP Cambridge- Cambridge City

Cambridge is a city on the River Cam in eastern England, approximately 50 miles (80 km) north of London and home to the prestigious University of Cambridge, dating to 1209. University colleges include King's, famed for its choir and towering Gothic chapel, as well as Trinity, founded by Henry VIII, and St John's, with its 16th-century Great Gate. Geographically it covers 15.71 sq miles with a population of 124,900. The populations main ethnicity is White British (66%) followed by British Asian and Chine (11%). TBAP Cambridge AP Academy in situated next to Milton Road Primary school and it about 10min walk to the town centre.

Concerns: Knife crime up 83% since 2014, Domestic Violence up 30% in 2016; Neglect, County Lines, CSE

TBAP Unity-St Neots

With a population of 40,000, St Neots is the largest town in Cambridgeshire. Serviced by the district council of Huntingdonshire and Cambridgeshire County Council, St Neots is situated within a triangle of the three main county towns of Cambridge, Peterborough and Bedford. Historically, St Neots has been a settlement area for London overspill and maintains close links to the capital today. It has direct rail links to London Kings Cross, and is easily accessed by road via the A1.

Concerns: CSE, County Lines, Violence and sexual offences, anti-social behaviour

TBAP Unity-Wisbech

Wisbech has an approximate population of 35,000 and is located in Cambridgeshire, bordered closely by Norfolk and Lincolnshire. It has recently been identified as an area of regeneration with a government funding scheme providing a new settlement of housing, an SEMH school and a secondary school alongside the associated amenities. A town with a predominantly agricultural industry, Wisbech has a large Central European community that has grown considerably in the past decade.

Concerns: are CSE, CCE, County Lines, a high number of LAC and CIN. Domestic Abuse, Violence and sexual offences, anti-social behaviour

Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education 2020](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#).

This policy is also based on the following legislation:

- Sections 157 and 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 on a school interview/appointment panel to be trained in safer recruitment techniques
- [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 \(Disqualification\) Regulations 2009](#) and [Childcare Act 2006](#), which set out who is disqualified from working with children

There are four main elements to our policy:

PREVENTION through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos;

PROCEDURES for identifying and reporting cases, or suspected cases, of abuse. The definitions of the four categories of abuse are attached (see Appendix A);

SUPPORTING CHILDREN particularly those who may have been abused or witnessed violence towards others;

PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN

Processes are followed to ensure that those who are unsuitable to work with children are not employed.

This policy is available to parents on request and is on all academy websites.

1.0 PREVENTION

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.

TBAP Academies will therefore:

- 1.0.1 Establish and maintain an environment where children feel safe, including in a digital context, and are encouraged to talk and are listened to
- 1.0.2 Ensure children know that there are adults in the school whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as appropriate.

TBAP Special School:

1.0.3 Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse in all contexts, including:

- How to recognise if family relationships are making them feel unhappy or unsafe and how to seek help or advice from others if needed.
- How to recognise who to trust and who not to trust, how to judge when a friendship is making them feel unhappy or uncomfortable...and how to seek help or advice from others, if needed.

- The importance of permission-seeking and giving in relationships with friends, peers and adults.
- That some people behave differently online, including by pretending to be someone they are not.
- The rules and principles for keeping safe online, how to recognise risks, harmful context and contact and how to report them.
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met.
- About the concept of privacy and the implications of it for both children and adults; including that it is not always right to keep secrets if they relate to being safe.
- That each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact.
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know.
- How to recognise and report feelings of being unsafe or feeling bad about any adult.
- How to ask for advice or help for themselves or others, and to keep trying until they are heard.
- How to report concerns or abuse, and the vocabulary and confidence needed to do so.
- Where to get advice e.g. family, school and/or other sources.

All TBAP Academies:

1.0.4 Incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse in all contexts, including:

- How to: determine whether other children, adults or sources of information are trustworthy: judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and, how to seek help or advice, including reporting concerns about others, if needed
- The characteristics of positive and healthy friendships
- That some types of behaviour within relationships are criminal, including violent behaviour and coercive control
- What constitutes sexual harassment and sexual violence and why these are always unacceptable
- About online risks, including that any material someone provides has the potential to be shared online and the difficulty of removed potentially compromising material placed online
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically explicit material e.g. pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, forced marriage, honour-based violence and FGM and how they can affect current and future relationships.

- How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).

1.2 Prevention of Peer on Peer Abuse

We recognise that peer on peer abuse can manifest itself in many ways. This can include but is not limited to: bullying, cyberbullying, sexual violence, sexual harassment, being coerced to send sexual images (sexting), teenage relationship abuse, physical abuse and upskirting ([part of the Voyeurism \(Offences\) Act, April 2019](#)).

1.3.1 All forms of peer on peer abuse are unacceptable and will be taken seriously.

TBAP Academies will therefore:

1.3.2 Create a whole school protective ethos in which peer on peer abuse, including sexual violence and sexual harassment will not be tolerated.

1.3.3 Provide training for staff about recognising and responding to peer on peer abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys' perpetrators.

1.3.4 Ensure that staff do not dismiss instances of peer on peer abuse, including sexual violence and sexual harassment as an inevitable part of growing up.

1.3.5 Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.

1.3.6 Provide high quality Relationship and Sex Education (RSE), including teaching about consent.

1.3.7 Ensure that staff members follow the procedures outlined in this policy when they become aware of peer on peer abuse.

2.0 PROCEDURES

2.1 We will follow the procedures set out by local authority safeguarding boards

2.2.1 The Trust Safeguarding Lead for Child Protection is: **Stephanie Larham**

2.2.2 Each academy has a named DSL and DDSL who have also received the Designated Safeguarding Lead training

2.2.3 The Trust Board member for Safeguarding and Child Protection is: **George Crosbie**

2.3 The TBAP Trust will:

2.3.1 Appoint a senior member of staff, from the leadership team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for child protection remains with the DSL and cannot be delegated.

2.3.2 Ensure that the role of DSL and DDSL is explicit in the role holder's job description.

2.3.3 Ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See 'Keeping Children Safe in Education, Annex B'). Ensure that the DSL and deputies have undertaken the two-day training provided by the relevant Local Authority and that this training is updated at least every two years.

Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via bulletins, meetings or further reading at least annually.

Ensure that every member of staff, paid and unpaid, and the TBAP Board members know who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the point of induction.

2.34 The TBAP Academy Designated Safeguarding Leads (DSL)

The Trust CEO Seamus Oates, Trust Safeguarding Lead Stephanie Larham and the Central Executive Team maintain a strategic lead on safeguarding across the Trust. Each academy within TBAP has their own DSL and Deputy DSL.

Their details are as follows;

TBAP WEST- Executive Principal -Krishna Purbhoo, TBAP Principal - Wasim Butt					
	Bridge -ICM	Latimer	Beachcroft	Courtyard	Portabello MIC
DSL	Ziah Raphael	Everol Halliburton	Peter Augustine	Daniela Caton	Debbie Butts
Deputy DSL	Matthew Daws	Suneeta Marecheau	Wasim Butt	Faye Peckham	Christine Bourke

TBAP EAST- Director – Ruth Browne			
	Cambridge	Octavia	Unity
DSL	Mel Newbery	Ahmed Kadi	Sarah Anderson Rawlins
Deputy DSL	Tony Machin	Richard Rushton	Wisbech: Callum Lawe St Neots: Alex Gillion

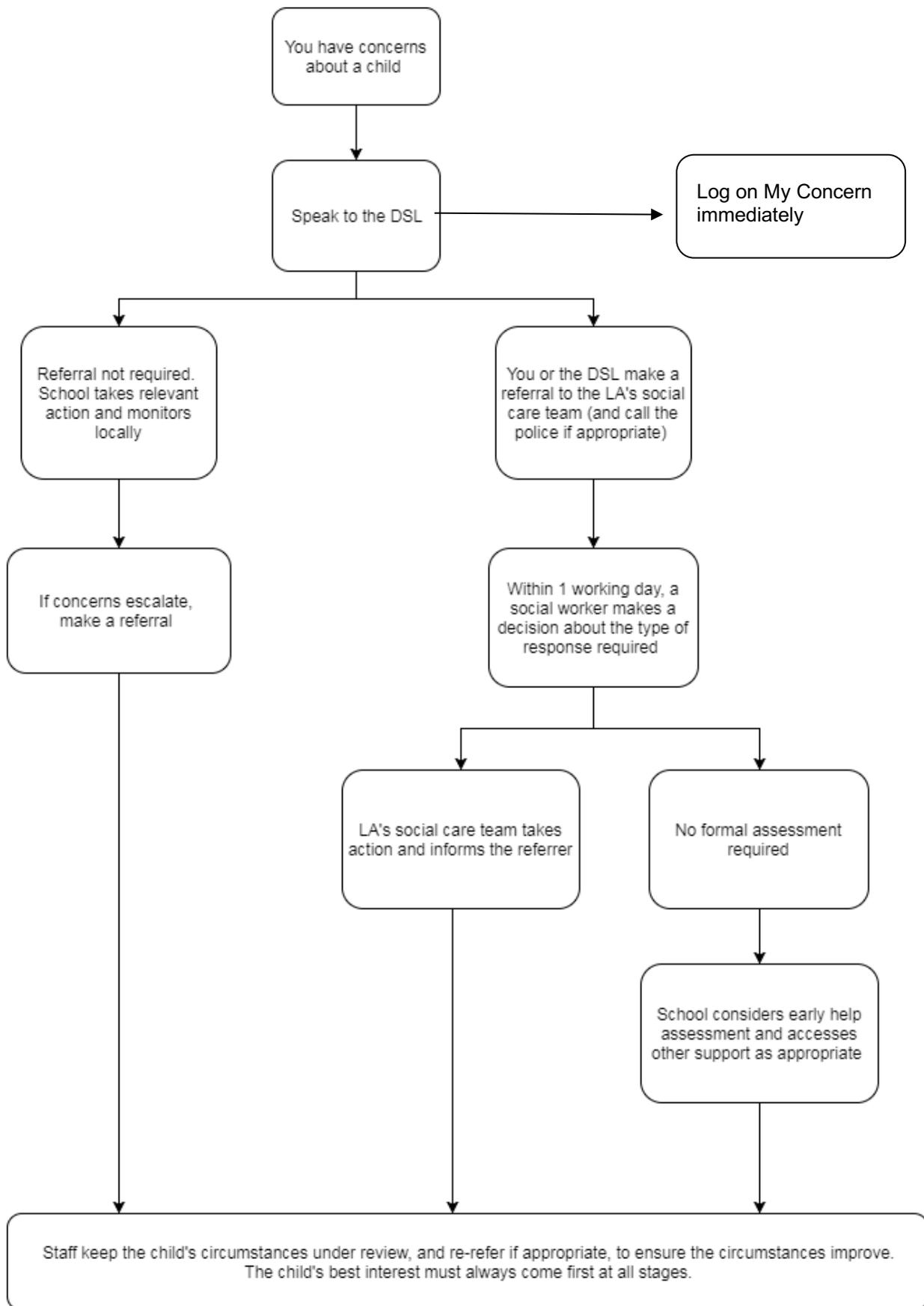
TBAP NORTH WEST- Director - Karen Thomson	
TBAP New Horizons	
DSL	Lisa Dykes
Deputy DSL	Sam Rigby White
Steph Larham TBAP Lead for Safeguarding and Children’s Welfare Email: Slarham@tbap.org.uk Tel: 07870887589 George Crosbie - TBAP Board Trustee – Safeguarding and Premises	

In the case of emergencies, the Trust Safeguarding Lead can be contacted out of hours through their work email address or work telephone number.

When the DSL is absent, the deputy will act as cover.

If the DSL and deputy are not available, Steph Larham, Trust Safeguarding Lead will act as cover (for example, during out-of-hours/out-of-term activities).

2.35 Figure 1: Follow If you have concerns about a child’s welfare but no immediate danger



2.3.6 Ensure that the DSL or *DDSL* are always available (during school hours, during term-time) to discuss any safeguarding concerns and that all staff are clear that in exceptional circumstances if the DSL and *DDSL* are not available they should contact school Principal or Trust Safeguarding Lead

Keeping Children Safe in Education 2020, paragraph 45, page 12, states: "Staff should consider speaking to a member of the senior leadership team and/or take advice from social care"

- 2.3.7 Liaise with the three safeguarding partners (Local Authority, clinical commissioning group and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018.
- 2.3.8 Nominate a board member for safeguarding and child protection who has undertaken appropriate training.
- 2.3.8 Ensure every member of staff and every board member knows:
- the name of the designated safeguarding leads/deputies and their role;
 - how to identify the signs of abuse and neglect;
 - how to pass on and record concerns about a pupil;
 - that they have an individual responsibility to be alert to the signs and indicators of abuse; and for referring child protection concerns to the DSL/DDSL;
 - that they have a responsibility to provide a safe environment in which children can learn;
 - where to find the Inter – Agency Procedures on the Safeguarding Children Partnership Board website;
 - their role in the early help process;
 - the process for making referrals to children’s social care.
- 2.3.9 Ensure all staff members undergo safeguarding and child protection training at induction. Ensure that staff training is regularly updated and that in addition to this training all staff members receive regular safeguarding and child protection updates as required but at least annually.
- 2.3.10 Ensure that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies.
- 2.3.11 Ensure that parents are informed of the responsibility placed on the school and staff in relation to child protection by setting out these duties in the school *prospectus/brochure/website (delete as appropriate)*.
- 2.3.12 Ensure that this policy is available publicly via the school websites or by other means.
- 2.3.13 Promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including children with a social worker) are experiencing/have experienced with teachers and school and leadership staff.
- 2.3.14 Where pupils are educated off site or in alternative provision, the school and the provider will have clear procedures about managing safeguarding concerns between the two agencies. Written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the school.

Details will be clearly set out in a Service Level Agreement. Details including named contact for safeguarding will be confirmed at the point of referral.

2.4 **Liaison with Other Agencies**

TBAP Academies will:

- 2.4.1 Work to develop effective links with relevant services to promote the safety and welfare of all pupils.
- 2.4.2 Co-operate as required, in line with 'Working Together to Safeguard Children,' (July 2018), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups.
- 2.4.3 Notify the relevant Social Care Team immediately if:
 - it should have to exclude a pupil who is subject to a Child Protection Plan (including fixed term exclusion)
 - there is an unexplained absence of a learner who is subject to a Child Protection Plan;
 - there is any change in circumstances to a learner who is subject to a Child Protection Plan.
- 2.4.4 When a learner who is subject to a child protection plan leaves, information will be transferred to the new school immediately. The Child Protection Chair and Social Work Team will also be informed.

[Please also refer to the Covid guidance attached as an Appendix to this policy for the actions schools should take to safeguard vulnerable children in liaison with children's social care.](#)

2.5 **Record Keeping**

TBAP Academies will:

- 2.5.1 Keep clear, detailed, accurate, written records of concerns about learners (noting the date, event and action taken), even where there is no need to refer the matter to Social Care immediately.
- 2.5.2 Ensure electronic records are stored on My Concern, an identified, purpose-built, secure platform
- 2.5.3 Ensure all relevant child protection records are sent to the receiving school or establishment when a learner moves schools in accordance with 'Keeping Children Safe in Education' (September 2020)
The DSL will consider whether it would be appropriate to share information with the new school/college in advance of a child leaving.
- 2.5.4 Make parents aware that such records exist except where to do so would place the child at risk of harm.

2.5.5 Ensure all actions and decisions are led by what is considered to be in the best interests of the child.

2.6 Confidentiality and information sharing

2.6.1 The Data Protection Act 2018 does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The school will:

2.6.2 Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately.

2.6.3 Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

2.6.4 Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL or Headteacher.

2.6.5 Ensure staff are clear with children that they cannot promise to keep secrets.

The Designated Safeguarding Lead/Deputies will:

2.6.6 Disclose information about a learner to other members of staff on a 'need to know' basis. Parental consent may be required.

2.6.7 Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner.

2.6.8 Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' July 2018)

2.6.9 [In cases where the 'serious harm test' is met, schools must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.](#)

2.6.10 Seek advice about confidentiality from outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

2.7 Communication with Parents/Carers

TBAP Academies will:

2.7.1 Ensure that parents/carers are informed of the responsibility placed on the school and staff in relation to child protection. This will be shared at induction and again at structured conversation meetings

- 2.7.2 Undertake appropriate discussion with parents/carers prior to involvement of another agency, unless the circumstances preclude this action.
- 2.7.3 Seek advice from Social Care if the school believes that notifying parents could increase the risk of harm to the child. Particular circumstances where parents may not be informed include any disclosure of sexual abuse or physical abuse where the child has an injury or where it may lead to the loss of evidence.
- 2.7.4 Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, record the reasons why. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence, (see 2.6.1)

2.8 Dealing with Sexual Violence and Sexual Harassment between children

The TBAP Trust recognises that sexual violence and sexual harassment can occur between two children of any age and sex. Sexual violence may include rape, assault by penetration or sexual assault. Sexual harassment refers to 'unwanted conduct of a sexual nature', such as sexual comments, sexual taunting or physical behaviour such as deliberately brushing against someone. Online sexual harassment may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages, and sexual exploitation, coercion and threats.

TBAP Trust will:

- 2.8.1 Be clear that sexual violence and sexual harassment will not be tolerated.
- 2.8.2 Provide training for staff on how to manage a report of sexual violence or sexual harassment.
- 2.8.3 Ensure staff make decisions on a case-by-case basis.
- 2.8.4 Train staff to reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
- 2.8.5 Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
- 2.8.6 Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations.
- 2.8.7 Liaise closely with external agencies, including police and social care, when required.
- 2.8.8 Further guidance can be found in 'Keeping Children Safe in Education - Part Five' (September 2020), 'Sexual violence and sexual harassment between children in schools and colleges,' (DfE, May 2018) and 'Sexting in schools and colleges: Responding to incidents and safeguarding young people' published by the UK Council for Child Internet Safety (UKCCIS)

3.0 SUPPORTING CHILDREN

TBAP Trust staff recognise that any child may be subject to abuse [and 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 and](#) as such will support all learners by:

- 3.1 Providing curricular opportunities to encourage self-esteem and self-motivation.
- 3.2 Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
- 3.3 Applying the school's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the learner's sense of self-worth. The school will ensure that the learner knows that some behaviour is unacceptable but they are valued and are not to be blamed for any abuse which has occurred.
- 3.4 Liaising with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services, Cambridgeshire Sexual Behaviour Service or Early Help Teams.
- 3.5 Developing productive and supportive relationships with parents/carers.
- 3.6 The school recognises that whilst any learner may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for those:
 - 3.6.1 Children with Disabilities, Additional Needs or Special Educational Needs

We recognise that, statistically, our learners with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

TBAP Trust, has on roll, learners with emotional and behavioural difficulties and/or challenging behaviours. Staff will be supported in deciding on appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHE curriculum, staff will teach children personal safety skills commensurate with their age, ability and needs. Learners will be taught personal safety skills such as: how to recognise if they are feeling unsafe including within family relationships and friendships; how to ask for help; the difference between safe and unsafe secrets; the difference between safe and unsafe physical contact; and how recognise and manage risk including in a digital context. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

TBAP Academies have pupils who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves

to others. Instead such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

All TBAP learners that have an Education, Health and Care Plan will have multi-agency planning and involvement to support integrated care.

3.6.2 Young Carers

TBAP Trust recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

School will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

3.6.3 Children at Risk of Criminal Exploitation

Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. School will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

The Designated Safeguarding Lead will complete Safeguarding Children Partnership Board's Exploitation (CSE / Criminal/Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

The school recognises that young people who go missing can be at increased risk of child criminal exploitation and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions – (see 3.6.4).

3.6.4 Children Frequently Missing Education

TBAP staff recognise that children going missing, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The school monitors attendance of individual learners closely, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.

TBAP Academies endeavor to hold more than one emergency contact for each learner to provide additional options to make contact with a responsible adult when a child missing education is identified as a welfare and/or safeguarding concern.

When a child is missing from education, the school will inform the Education Welfare Officer and Social Care if a missing child is subject to a Child Protection Plan or there have been ongoing concerns.

3.6.5 Children Misusing Drugs or Alcohol

The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the school will consider such action in the following situations:

When there is evidence or reasonable cause:

- To believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults;
- Where the misuse is suspected of being linked to parent/carer substance misuse.
- Where the misuse indicates an urgent health or safeguarding concern
- Where the child is perceived to be at risk of harm through any substance associated criminality

3.6.6 Children at Risk of Child Sexual Exploitation

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.

Sexual exploitation can take many different forms from the seemingly 'consensual' relationship to serious organised crime involving gangs and groups. Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

The Designated Safeguarding Lead will complete the Exploitation (CSE / Criminal/Gangs) Risk Assessment and Management Tool and refer to Social Care if there is a concern that a young person may be at risk of CSE.

TBAP staff recognise that young people who go missing can be at increased risk of sexual exploitation and there are procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions (see 3.6.4).

3.6.7 Children Living with Substance Misusing Parents/Carers

Misuse of drugs and/or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

When a TBAP Academy receives information about drug and alcohol abuse by a child's parents/carers they will follow appropriate procedures.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods as a result of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child

3.6.8 Children Living with Domestic Abuse

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional.

TBAP staff recognise that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. Academy staff will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

3.6.9 Children at risk of 'Honour- Based' Abuse including Female Genital Mutilation

So called 'honour-based' abuse encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The school takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBV through training. Staff are required to treat all forms of HBV as abuse and follow the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

3.6.10 Children who have returned home to their family from care

TBAP staff will recognise that a previously looked after child potentially remains vulnerable. Staff will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern.

3.6.11 Children showing signs of Abuse and/or Neglect

TBAP staff recognise that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children 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.

School will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy. The definitions of the four categories of abuse are attached (see Appendix A).

3.6.12 Children at Risk of Radicalisation

TBAP Trust recognises that children are vulnerable to extremist ideology and radicalisation and that protecting children from this risk forms part of the safeguarding response.

The Head of School will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent duty.

Staff are required to be alert to changes in children's behavior which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. If appropriate the DSL will make a Channel referral.

See also 'The Prevent Duty, Departmental advice for schools and childcare providers', DfE (June 2015), and 'Revised Prevent Duty Guidance: for England and Wales,' HM Government, (July 2015).

3.6.13 Privately Fostered Children

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

DSLs will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

3.6.14 Children who have Family Members in Prison

TBAP Trust is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.

We recognise that children with family members in prison are at risk of poor outcomes including poverty, stigma, isolation, poor mental health and poor attendance.

Staff will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

Staff will work with the family and the child to minimise the risk of the child not achieving their full potential.

4.0 **PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN**

4.1 TBAP Trust operates safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part three of 'Keeping Children Safe in Education' (2020). This section should be read in conjunction with the Safer Recruitment Policy.

4.2 The Board will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

4.3 Any allegation of abuse made against a member of staff (including supply staff and volunteers) will be reported straight away to the Head of School or Principal.

The Head of School will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a member of staff, supply staff or volunteer

and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', (2020) and the Trust's HR Policies.

- 4.5 In cases where the Head of School or Principal is the subject of an allegation, it will be reported to the Chair of Board Gus Sekhon. The Academy will follow the procedures set out in Part four of 'Keeping Children Safe in Education' (2020).

The Head of School, Principal or Chair of Board should not seek to interview the child/ren or members of staff involved until advice has been sought. Doing so may compromise any police interviews that may be necessary.

- 4.6 The Trust will ensure that any disciplinary proceedings against staff, [supply staff](#) or volunteers relating to child protection matters are concluded in full even when the member of staff, [supply staff](#) or volunteer is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

- 4.7 Staff ([including supply staff and volunteers](#)) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

- 4.8 Consideration must be given to the needs of the child and a recognition that a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

- 4.9 TBAP Trust will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (May 2019). As part of the Induction process, all staff, paid and unpaid, will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.

- 4.10 All staff have signed to confirm that they have read 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (May 2019).

- 4.11 The Trust will ensure that staff, [supply staff](#) and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

- 4.12 Communication between pupils and adults, by whatever method, should at all times be transparent and take place within clear and explicit professional boundaries and are open to scrutiny.

5.0 OTHER RELATED POLICIES AND PROCEDURES

5.1 This policy links to our:

Anti-bullying policy
Attendance policy
Behaviour policy
Complaints procedure
Online Safety and Acceptable Use policy
Safer Recruitment policy
Staff Code of Conduct/Safer Working Practice
Staff Discipline and Grievance procedures
Whistleblowing policy

6.0 **Trust Board: CHILD PROTECTION RESPONSIBILITIES**

6.1 The Board fully recognises its responsibilities with regard to child protection and safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and training in all TBAP Academies are effective and comply with the law and government guidance at all times.

It will:

- Nominate a Board Member for safeguarding and child protection who will take leadership responsibility for the safeguarding arrangements and practice and champion child protection issues.
- Ensure an annual report is made and any weaknesses will be rectified without delay.
- Ensure that this Safeguarding and Child Protection policy is annually reviewed and updated and shared with staff. It will be made available on the website.
- Ensure that children's exposure to potential risks while using the internet is limited by having in place age appropriate filtering and monitoring systems.
- Ensure children's wishes and feelings are taken into account where there are safeguarding concerns.

6.2 Extended Schools and Before and After School Activities (on or off school site)

6.2.1 If the Trust provides extended school facilities or before or after school activities directly under the supervision or management of school staff, the Trust's arrangements for child protection as written in this policy shall apply.

6.2.2 Where services or activities are provided separately by another body, either on or off school site, the Trust will seek assurance that the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with the school on these matters where appropriate.

This policy was agreed in September 2020 and will be reviewed annually by the TBAP Trust Board

Date of next review:

