



PACE Academy Trust



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# PACE Academy Trust

## Safeguarding and Child Protection Policy Beecholme Primary School 2025-2026

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### **UN Convention on the Rights of the Child**

**Article 19** Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them

<b>Document Control Table</b>			
<b>Document Title</b>		Safeguarding and Child Protection Policy (PACE Schools)	
<b>Author</b>		Trust Designated Safeguarding leads	
<b>Version number:</b>		9A	
<b>Date approved:</b>		24/09/25	
<b>Approved by:</b>		PACE Strategic Board	
<b>Document History:</b>			
<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Note of revisions</b>
V1a	20.01.2019	Safeguarding leads	Updated in line with DfE 'Keeping Children Safe in Education' 2018 Reflects safeguarding arrangements in PACE schools in the Borough of Merton.
V2a	27.11.19	DSL Team	Updated in line with 'Keeping Children Safe in Education' 2019
V3a	07/07/20	DSL Team	Updated in line with 'Keeping Children Safe in Education' 2020
V4a	16/07/21	DSL Team	Updated in line with 'Keeping Children Safe in Education' 2021
V5a	08/07/22	DSL Team	Updated in line with 'Keeping Children Safe in Education' 2022
V6a	11/05/ 2023	ZH/DSL Team	Reviewed to increase personalisation to PACE and individual schools.
V7a	6/7/23	DSL Team	Updated to reflect KCSiE 2023
V8a	15/7/24	ZH/DSL Team	Updated to reflect KCSiE 2024
V9a	01/09/25	ZH	Updated to reflect KCSiE 2025



## Beecholme Primary School Safeguarding Statement

Beecholme Primary School is committed to safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment.

This means that we have a Child protection and safeguarding Policy and procedures in place: these can be viewed on our website under the information / policies section. All staff (including supply staff, [volunteers](#) and governors) must ensure that they are aware of these procedures.

Our Designated safeguarding lead is – Mrs Hayley Lewis		
DSL – Mrs Hayley Lewis Headteacher  	DDSL – Ms Debbie McKenzie Assistant Headteacher  	DDSL – Ms Julia Sener SENCO  
Additional Safeguarding Leads		
Miss Donna Keenan LSA/ELSA  		Mrs Christine Lorimer Office Administrator  

If you are concerned about a child's welfare, please record your concern, and any observations or conversations heard, and report to one of the DSLs as soon as [possible](#) the same day. Do NOT conduct your own investigation.

MASH – 0208 545 4226/0208 545 4227

MASH Out of Hours – 0208 770 5000

LADO – John Shelley: 0208 545 4226/ LADO business Support – Jody Louis: 0208 545 3179

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## **Introduction and Aims**

At PACE Academy Trust the safety and welfare of our pupils is of the utmost importance. Article 19 of the United Nations Convention on the Rights of the Child (UNICEF) states that ‘Governments must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their parents or anyone else who looks after them’. Article 19 is about children having the right to feel safe and to be protected from violence, abuse and neglect; this policy underpins that right.

Our schools will ensure that all children are safeguarded by expecting members of staff to maintain a culture of vigilance and work together proactively with children and families who may need help. Every member of staff who comes into contact with our pupils, and their families, has a role to play in keeping children safe.

We know that children learn best when they are healthy, safe and secure, when their individual needs are met and when they have positive relationships with the people caring for them. We aim to have schools which are welcoming, safe and stimulating and where children are safe, enjoy learning and where everyone feels included, respected and valued. All necessary steps are taken to keep children safe, well and ensure they thrive.

This policy aims to provide all staff, volunteers, children and their families with a clear and secure framework for ensuring that all children in our schools are protected from harm, both while at school and

when off the school's premises.

*We will always maintain an attitude of 'it could happen here'.*

## **What is Safeguarding?**

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting 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; and
- taking action to enable all children to have the best outcomes.

This policy has been written with reference to statutory guidance including:

- Working Together to Safeguard Children (DfE 2023)
- Keeping Children Safe in Education (DfE Sept 2025)
- What to do if you are worried a child is being abused (DfE, 2015)

## **Links with other School Policies**

PACE recognises that several other school policies and procedures form part of the wider safeguarding and welfare agenda and therefore this Safeguarding and Child Protection Policy should be read in conjunction with the policies listed below:

- Code of Conduct for staff
- Acceptable Use Policies for staff, pupils, parents, volunteers
- Anti-bullying and anti-discrimination policy
- Behaviour policy
- Attendance policy
- Online safety (inc social media) policy
- Health and Safety Policy
- Safer Recruitment Procedures
- Whistleblowing
- Medicines and First Aid Policy
- Educational Visits Policy

## **Contextual Safeguarding**

It is important that we recognise the contextual differences across our schools. This means that in each of our settings there will need to be a different emphasis on certain aspects of safeguarding, depending on the needs and vulnerabilities of the community.

In each of our schools, we ask, *'what are we protecting our children from?'* and work with the local authority, staff and pupils for their views on this. We use this insight to help ensure our training and the support we offer is matched to the needs of the community we serve.

These are the main issues identified in our locality/school:	Our school response. What we are doing to tackle this issue:
Online Safety (school)	<ul style="list-style-type: none"> <li>• Annual online safety training for staff as well as in-house/trust training</li> <li>• Online safety day/week for children</li> <li>• Links with local community services</li> <li>• Links with local secondary school</li> <li>• Addressed in Computing curriculum</li> <li>• Covered in assemblies</li> <li>• Online safety lead in school</li> <li>• Parent workshops</li> <li>• Robust Filtering and monitoring systems in place</li> </ul>
Adverse childhood experiences (school)	<ul style="list-style-type: none"> <li>• ELSA support for parents and children</li> <li>• Thrive Practitioner apprenticeship being completed by a member of the team</li> <li>• Staff training in ELSA</li> <li>• Staff training in ACE's and understanding what these are</li> <li>• Annual safeguarding training to support staff recognise the signs of abuse or neglect</li> <li>• Working closely with Merton mental health team</li> </ul>
Domestic Abuse (locality)	<ul style="list-style-type: none"> <li>• Training for adults/CPD</li> <li>• DSL attending local courses and roadshows based on domestic abuse within the community</li> <li>• Enterprise driven curriculum</li> <li>• Assemblies</li> <li>• Addressed within the PHSE/Jigsaw curriculum</li> <li>• ELAS support for children and families effected</li> </ul>
Physical Chastisement	<ul style="list-style-type: none"> <li>• Training for staff/Focus on this during September INSET updates</li> <li>• DSL attending local training</li> <li>• Early help involvement/parenting workshops where necessary</li> <li>• Designated Early Help Practitioner to support families</li> <li>• ELSA support for the children</li> </ul>
Radicalisation (locality)	<ul style="list-style-type: none"> <li>• Annual prevent training for staff as well as in-house/trust training</li> <li>• Links with local community services</li> <li>• Links with local secondary school and beginning a youth mentoring programme with support from some of the secondary school children.</li> <li>• Addressed in PSHE curriculum broadly in Year 6</li> <li>• Covered in assemblies</li> </ul>
Serious Youth Violence (locality)	<ul style="list-style-type: none"> <li>• Annual prevent training for staff as well as in-house/trust training</li> <li>• Links with local community services</li> <li>• Links with local secondary school and beginning a youth mentoring programme with support from some of the secondary school children.</li> <li>• Addressed in PSHE curriculum broadly in Year 6</li> <li>• Covered in assemblies</li> </ul>

## Key School Contacts

Position	Name	Contact Details (email/phone)
Senior Designated Safeguarding Lead	Hayley Lewis	Hayley.lewis@beecholme.paceacademy.uk
Deputy Designated Safeguarding Lead	Debbie McKenzie	Debbie-Ann.McKenzie@beecholme.paceacademy.uk
Deputy Designated Safeguarding Lead	Helen Gilroy	Helen.gilroy@beecholme.paceacademy.uk
Deputy Designated Safeguarding Lead	Julia Sener	senco@beecholme.paceacademy.uk
Additional safeguarding lead	Donna Keenan	Donna.Keenan@beechome.paceacademy.uk
Additional safeguarding lead	Christine Lorimer	Christine.lorimer@beechome.paceacademy.uk
Designated Teacher for Children who are Looked After (CLA)	Julia Sener	senco@beecholme.paceacademy.uk
Senior Mental Health Leader	Helen Gilroy	Helen.gilroy@beecholme.paceacademy.uk
Designated Governor for Safeguarding	Sue Brackenbury	office@beecholme.paceacademy.uk
PACE Safeguarding Leads	Zoe Harris - CEO Clare Wingrave – Safeguarding Director Jo Grinter - COO	<a href="mailto:Zoe.harris@paceacademytrust.com">Zoe.harris@paceacademytrust.com</a>

## Roles and Responsibilities

All members of staff within our schools have a role to play in safeguarding and promoting the welfare of children.

### All Members of Staff must

- read and understand Part One of Keeping Children Safe in Education, 2025. Staff and leaders working directly with children must also read Annex A.
- attend child protection training, every two years as a minimum, and updates on safeguarding and child protection at least annually.
- be aware of the mandatory duty that requires teachers to report known cases of Female Genital Mutilation involving children under the age of 18 to the police.
- have a responsibility to provide a safe environment in which children can learn.
- know what to do if a child tells them he/she is being abused or neglected.

- know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.
- never promise a child that they will not tell anyone about an allegation.
- be aware of the signs of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
- maintain an attitude of ‘it could happen here’.
- always act in the best interests of the child.
- maintain records about any concerns they have about a child on our safeguarding software system.

### **The Designated Safeguarding Lead (DSL)**

The role of the Designated Safeguarding Lead carries a significant level of responsibility, and they should be given the time, funding, training, resources and the support they need to carry out the role effectively. DSLs will:

- fulfill the role of the DSL as detailed in the PACE DSL job description and **Annex C** of KCSIE
- be supported by other senior DSLs across PACE and through supervision where appropriate
- take a lead responsibility for early help, safeguarding and child protection within the school.
- keep written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child’s general file.
- consult initially with a statutory child protection agency to talk about any doubts or uncertainty.
- make a formal referral to a statutory child protection agency or police as necessary,
- notify children’s social care if a child with a child protection plan is absent for more than two days without explanation.
- ensure that when a child with a child protection plan leaves the school, their information is passed to their new school and the child’s social worker is informed.
- liaise with the headteacher or head of school to inform him or her of issues- especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations.
- ensure that all staff sign to indicate that they have read and understood this policy.
- ensure that the child protection policy is updated annually and shared with governors.
- keep a record of staff and governor attendance at safeguarding and child protection training.
- ensure there is a process for contacting the school’s DSL out of school hours including publishing the name of the safeguarding lead on the website.
- Have an understanding of the importance of safer recruitment processes and an awareness of how safer recruitment practice is managed within the school.

Across PACE our DSLs will attend the required training every two years and refresher training annually.

### **The Headteacher/ Head of School:**

- ensures that the policy and procedures are implemented and followed by all staff.
- allocates sufficient time and resources to enable the DSLs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school’s whistle blowing procedures.
- ensures that child’s safety and welfare is addressed through the curriculum.

- ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of KCSIE.
- Undertakes/updates their safer recruitment training every two years and ensures other staff involved in recruitment of staff have also received training.

### **The Strategic Safeguarding Lead for PACE Academy Trust:**

- Provides safeguarding training for governors and directors - at least twice yearly.
- Monitors the safeguarding audits to identify common areas for further training.
- Ensures governors and directors are kept up to date through regular (at least twice yearly) safeguarding reports to the LGB/Strategic board.
- Ensures that there is a termly network meeting for DSLs and that senior DSLs have access to supervision.
- Ensures the PACE Safeguarding and Child Protection policy is reviewed annually and that other policies related to safeguarding are reviewed regularly and reflect current legislation.
- Monitors the Single Central Register at least twice yearly for each school, ensuring compliance and best practice.
- Has oversight of safeguarding practice across PACE.
- Supports DSLs with serious cases and complex reviews.
- Ensures all DSLs have been provided with a copy of the DSL job description which is reviewed annually in line with KCSIE updates.
- Ensures staff, governors and trustees involved in recruitment have completed safer recruitment training; and that this is updated in line with this policy.

### **Our Governors are responsible for:**

- Appointing a nominated governor for safeguarding and child protection on the governing board.
- Ensuring safeguarding is given a high profile at governance level.
- Ensuring that an effective safeguarding and child protection policy and procedures is in place and underpins the safeguarding culture of the school.
- Ensuring the policy is reviewed annually.
- Ensuring staff are provided with Part One of Keeping Children Safe in Education, 2025– Appendix A and are aware of specific and relevant safeguarding issues.
- Ensuring that all the DSLs undergo formal child protection training every two years and receive regular (annual) safeguarding refreshers.
- Creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensuring that the wellbeing curriculum contains safeguarding specific topics.
- Ensuring appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material.
- Ensuring that there is a Designated Teacher for Children Looked After.
- Monitoring the Single Central Register to ensure compliance.
- Ensuring that at least one member of the board has completed safer recruitment training and has assurance that the headteacher and other senior staff involved in recruitment have also completed this training.

### **What school staff should do if they have concerns about safeguarding practices within the school**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the

senior leadership team. Our whistleblowing procedures can be accessed via the PACE website. The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally.

## Types of Abuse, Neglect and Exploitation

### **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 by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

All members of staff should be aware that abuse, neglect, exploitation 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. 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 DSL to decide how to proceed. It is very important that members of staff report concerns – they do not need ‘absolute proof’ that the child is at risk.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be domestic abuse, including where children see, hear or experiences its effects.

Detailed definitions and indicators of the different types of abuse and neglect can be found in Keeping Children Safe in Education. In summary these are:

**Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to 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. 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 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. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

**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 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Safeguarding Children in Specific Circumstances

*We will always maintain an attitude of 'it could happen here'*

### Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including child sexual exploitation, forced labour, slavery and child criminal exploitation.

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

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. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older boyfriends or girlfriends.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education or do not take part in education.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too.

### Young people at risk from gang activity or serious youth violence

Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities. Children can be

targeted at any age so whilst our schools are all primary settings, it is important that we remain vigilant to this area of safeguarding, particularly as our schools are in areas of Croydon and Merton where gang activity exists.

Staff should be aware of the indicators which may signal that children are at risk from, or are involved with serious violent crime may include:

- Increased absence
- Change in friendship groups
- Relationships with older individuals or groups
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions
- Significant decline in performance

These may indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Across PACE, we need to be alert to the possibility of children and young people bringing weapons onto their school site. There are various reasons why a young person may be carrying a weapon. These should be explored with the young person. The police must be informed via 101 of any pupils found in possession of a weapon in school or any weapon that is found on the school site.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. Those involved with county lines will often go missing for a few days at a time. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children involved in county lines may be considered as having been trafficked and be victims of criminal exploitation.

### **Female Genital Mutilation (FGM) and so-called “Honour Based” Abuse**

So-called ‘honour-based’ abuse 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).

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

### **Breast Ironing**

Breast Ironing is viewed as a form of protection for girls in making them appear younger thus reducing the likelihood of pregnancy practiced in African countries, notably Cameroon. Staff worried about the risk of

breast ironing should speak to our DSL as soon as possible.

### **Forced Marriage**

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. We have an important role in safeguarding children from forced marriage.

### **Safeguarding Children who are Susceptible to Extremism and Radicalisation**

PACE schools value freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions; this is underpinned by UNICEF Article 14, which states that *'every child has the right to think and believe what they choose and also to practice their religion, as long as they are not stopping other people from enjoying their rights'*. Free speech that is designed to manipulate vulnerable individuals or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of the law, individual liberty and the mutual respect and tolerance of different faiths and beliefs.

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

**Radicalisation** is the process of a person legitimising support for, or the use of terrorist violence. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for, which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people.

### **Reducing the Risk of Radicalisation**

The head and DSL will assess the level of risk within the school using the **LGFL Prevent Risk Assessment** and put personalised actions in place that reduce the contextual risk.

Across PACE we also aim to reduce risk through:

- Promoting active engagement with parent/carers as they are in a key position to spot signs of radicalisation. We will assist and advise families who raise concerns and point them to the right support mechanisms. We will also discuss any concerns about possible radicalisation with a child's parents in line with this policy unless we have specific reason to believe that to do so would put the child at risk.
- Ensuring that as many members of staff as possible undertake preventing radicalisation training.
- Ensuring children are safe from terrorist and extremist material when accessing the internet in school.
- Referring individuals to the Channel programme if the school is concerned that an individual might be vulnerable to radicalisation.

## **Domestic Abuse, Sexual Violence and Sexual Harassment**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The Domestic Abuse Act 2021 defines this abuse as:

*'Behaviour of a person (A) towards another person (B) is domestic abuse if:*

*A and B are each aged 16 or over and are personally connected to each other, and the behaviour is abusive.'*

Behaviour is abusive if it consists of any of the following:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological, emotional or other abuse

Domestic abuse can have a huge impact on affected children and young people. It can affect their mental health, safety, physical health and wellbeing, educational attainment, family and peer relationships, and their ability to enjoy healthy, happy, respectful relationships in the future. All children can witness and be adversely affected by domestic abuse in the context of their home life, where domestic abuse occurs between family members.

It is likely that there will be young people and staff within our schools who are experiencing or perpetrating domestic abuse or sexual violence. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never feel that they are creating a problem or feel ashamed that they are reporting abuse.

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. When there has been a report of sexual violence, the designated safeguarding lead should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. These issues affect men and women but are mainly experienced by women and girls. It is important to always consider domestic and sexual abuse as a possible explanation for any unusual behaviour.

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school or college. 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. 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
- displaying pictures, photos or drawings of a sexual nature
- upskirting
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment

and/or sexual violence. It may include:

- ~ consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- ~ sharing of unwanted explicit content
- ~ sexualised online bullying
- ~ unwanted sexual comments and messages, including, on social media
- ~ sexual exploitation; coercion and threats
- ~ coercing others into sharing images of themselves or performing acts they're not comfortable with online.

Any concerns that a child may be at risk of significant harm must be reported immediately to the DSL as they are likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school.

### **Inappropriate Sexual Behaviour**

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

### **Child on Child Abuse including Sexual Violence and Harassment**

Child on child abuse is when children abuse other children. This can happen inside and outside of school. Just because child on child abuse is not reported, it does not mean that it is not happening.

Child on child abuse including sexual violence and harassment can occur between two children of any age and sex. It can occur through a group of children or a single child sexually abusing or harassing another. We recognise that it is more likely that girls will be victims and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Across our schools, we are aware of and respond appropriately to **all** reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. We have a zero-tolerance approach to child-on-child abuse including sexual violence and harassment. Child-on-child abuse will never be passed off as "banter" or children "just having a laugh" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Forms of child-on-child abuse include:

- ~ bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- ~ abuse in intimate personal relationships between children (also known as teenage relationship abuse)  
physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

- ~ sexual violence and sexual harassment.
- ~ consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- ~ causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- ~ upskirting (which is a criminal offence<sup>45</sup>), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- ~ initiation/hazing type violence and rituals.

It is essential that **ALL** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, 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. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

### **Upskirting**

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permissions and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Anyone of any gender can be a victim.

### **Youth Generated Sexualised Imagery**

Youth produced sexual imagery includes young people sharing images that they, or another young person, have created of themselves.

This means:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

Adults in the school will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the DSL will respond to an incident based on what they have been told about the imagery.

We want the pupils to be fully aware of the dangers and possible repercussions of youth generated sexualized imagery. Through our wellbeing curriculum, this information will be communicated to pupils in an age-appropriate way.

Disclosures about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in school, or any member of the school staff. He/she may report through an existing reporting structure, or a friend or parent may inform someone in school or college or inform the police directly. A child who discloses he/she is the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort, and they may have already tried to resolve the issue themselves.

## **Mental Health**

All staff should 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 should observe children day-to-day and identify those whose behaviour suggests that they may well be experiencing a mental health problem or be at risk of developing one. These concerns must be logged on the school's safeguarding reporting system.

Across PACE Academy Trust, we have a curriculum and resources in place to support the mental health and wellbeing of our pupils. Any staff member concerned about a child's mental health or wellbeing should speak to a DSL.

## **Bullying (Including Online Bullying)**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to 12 child suicides each year. All incidences of bullying should be reported and will be managed through our behaviour and anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and have access to it via the school website. The subject of bullying is addressed at regular intervals in the Wellbeing curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the head teacher and the DSL will consider implementing child protection procedures.

## **Children with family members in prison**

Across PACE we recognise that a number of our children may have family members in prison. These children may be at risk of poor outcomes including poverty, stigma, isolation and poor mental health, particularly if it a parent or sibling. We will work with families to identify these children and put in place personalised support.

## **Homelessness or at risk of becoming homeless**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a child may be at risk of homelessness include:

- household debt
- school debt
- domestic abuse
- tired and withdrawn
- absence from school
- unkempt appearance
- decline in performance
- Recent or previous house or school moves

When children are identified as homeless or at risk of homelessness, our staff will work with the family to identify the support needed. This may include an Early Help referral, access to pastoral support and practical necessities such as food packages, sanitary items and uniform support.

## **Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online materials. Across PACE Academy Trust, children are taught regularly about online safety and the dangers online. All staff follow our Online Safety (inc Social Media) Policy to ensure children are kept safe from harm online.

Our Computing and Safeguarding/Wellbeing curriculums cover the four areas of risks:

- ~ **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- ~ **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- ~ **conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
- ~ **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

A child may be experiencing abuse online if they:

- spend lots, much more or much less time online, texting, gaming or using social media.
- are withdrawn, upset or outraged after using the internet or texting.
- are secretive about who they're talking to and what they're doing online or on their mobile phone.
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

As part of our Safeguarding and Wellbeing, and the Computing curriculum, children are taught about online safety and how to seek help if they view something inappropriate. Further information around this can be found within our Safeguarding and Wellbeing Policy/Curriculum Themes and Online Safety Policy.

The school will ensure staff undergo regularly updated safeguarding training and that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

Due to ever evolving technology and associated risks, our PACE schools are aware of the rapid changes and have regular reviews regarding our approach to online safety as well as our filtering and monitoring systems.

## Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded

'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources

making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL should consider referring into the nationwide police programme called Cyber Choices. This aims to intervene where young

people are at risk of committing, or being drawn into, low-level cyber-dependent offences.

### **Filtering and Monitoring**

Across PACE, the internet connection is provided by LGfL. This means we have a dedicated and secure, schoolsafe connection, which is protected with firewalls and multiple layers of security, including a web filtering system, which is made specifically to protect children in schools.

We do all that we can do to limit children's exposure to the above risks from our IT systems. As part of this process, our governing bodies and OpenAir (our IT support service) ensures that each of our PACE schools has appropriate filters and monitoring systems in place; these are regularly reviewed to determine their effectiveness. As well as leaders in school, OpenAir are responsible for monitoring the use and effectiveness of filters and will report concerns to the DSL and our PACE Chief Executive Officer. We consider the age range, number of children, how often they access the IT system and the safeguarding risks.

We use a variety of ICT facilities to communicate with our staff, pupils, and wider community including external post and telephones, photocopying and printing, email, internet enabled platforms and channels or social media. These facilities are provided for business purposes only. It is important to recognise that whilst use of these facilities is essential to the delivery of our services, the ICT resources and facilities we use also pose risks to online safety, to the safety of children, to data protection and to network security.

Any device that connects to the school wifi system (be that a school device or personal device) will automatically link to the trust's filtering and monitoring system

The appropriateness of any filters and monitoring systems will be informed in part by each school's **Prevent Risk Assessment**. The school will ensure staff undergo regularly updated safeguarding training and that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

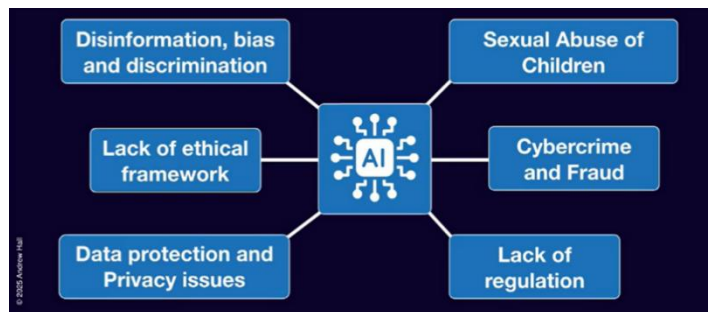
At each PACE school, senior leaders:

- Identify and assign roles and responsibilities to manage filtering and monitoring.
- Ensures a review of filtering and monitoring provision is completed at least annually.
- Ensure systems are in place to block harmful and inappropriate content without unreasonably impacting teaching and learning (over-blocking).
- Continuously aim to limit children's exposure to the risky online content through the schools' IT systems.
- Complete the GOV.UK self-assessment [Plan technology for your school - GOV.UK](#) and identify an action plan that work towards meeting the following DfE guidance: [Filtering and Monitoring Standards](#).
- Understand how to use generative artificial intelligence safely
- Understand that filtering and monitoring requirements apply to the use of generative AI in education. [Generative AI: product safety expectations - GOV.UK](#)

All staff provided with access to ICT equipment must use these facilities to the highest professional and personal standards and in line with the standards of behaviour set out in the PACE Code of Conduct. To safeguard children and our systems, we have the right to monitor emails and internet use on PACE systems and devices.

### **Artificial Intelligence**

Staff members are expected to use Artificial Intelligence (AI) tools responsibly and ethically, ensuring accuracy, transparency, and respect for privacy, in adherence to PACE guidelines around the safe use of AI in education. Staff should be aware of the potential harms of Artificial Intelligence:



## Operation Encompass

Across our PACE Academy trust schools, we have access to Operation Encompass. This system helps police and schools to work together to provide emotional and practical support for children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will form an alert on the system for the DSL.

## Vulnerable groups

### Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or exploitation and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

### Children Absent from Education

Children absent from education are those who are absent for prolonged periods of time or repeated occasions, or both. A child absent from education, which is unexplainable and/or persistent is a potential indicator of abuse or neglect. Our staff will follow this policy, alongside our attendance policy, particularly when children are persistently absent without reason to help identify risk and prevent the risks from escalating. It is essential that all staff are alert to signs to look out for, are professionally curious and aware of the individual triggers when considering the risks of potential safeguarding concerns. These may include travelling to conflict zones, Female Genital Mutilation, county lines and forced marriage. At PACE, we ensure that we have a multi-agency approach to managing poor attendance, especially when children have a social worker.

When children are *missing* from education (CME), our schools must liaise with the local authority and follow the relevant guidance.

### Children with special educational needs, disabilities or health issues

Across PACE Academy Trust, we recognise that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based

bullying) than other children

- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison between the DSL and the SENDCo.

### **Elective home education**

Many home educated children have positive learning experience. However, this is not the case for all. Elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs.

Parents need to complete a referral to the Local Authority if they are considering home education for their child. Any decision relating to elective home education must be based on a meaningful discussion between the school, Local Authority and the parents.

### **Children who are looked after and children who were previously looked after**

PACE recognises that children who are looked after or have been previously looked after are particularly vulnerable due to their status. The designated teacher for CLA has specialist knowledge of the issues faced by this group and will work alongside the designated safeguarding lead to seek advice if there are safeguarding concerns.

The designated teacher should work with the virtual school head (which is borough specific to the each CLA child) as well as the allocated social worker, to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children.

### **Special Guardianship Orders**

A special guardianship order is an order appointing one or more individuals to be a child's 'special guardian'. It is a private law order made under the Children Act 1989 and is intended for those children who cannot live with their birth parents and who would benefit from a legally secure placement.

Special guardians share parental responsibility with the child's birth parents but can make nearly all decisions about the child without the birth parents' consent or even knowledge. As the child's primary carer, they are responsible for all aspects of their wellbeing. The Special Guardianship lasts until the child is 18 (unless the order is changed or cancelled). The DSL should be aware of any child with a special guardianship order and must provide relevant, regular, support.

### **Court Orders for Parent Responsibility Orders**

A Parental Responsibility Order is an order under the Children Act 1989, which fathers can apply for when they are not married or in a civil partnership with the mother and the mother refuses to allow the father

to be registered or re-registered on the birth certificate, or refuses to sign a Parental Responsibility.

If the court decides that the father should have parental responsibility, the order will give him equal parental responsibility with the mother. An application for a Parental Responsibility Order may be made to the family proceedings court, the county court or the high court.

It is important to note that fathers who are named on the child's birth certificate are automatically granted parental responsibility.

### **Privately fostered children**

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 is a 'close relative' for 28 days or more. Designated safeguarding leads must refer to their local authority any private fostering arrangements that they become aware of.

### **Young carers**

Across PACE, we will contact the Young Carers Service in respect of any child who we believe is a young carer and we are concerned about.

### **Children who are lesbian, gay, bisexual or gender questioning- THIS SECTION REMAINS UNDER REVIEW BASED ON THE OUTCOME OF THE GENDER QUESTIONING CHILDREN GUIDANCE CONSULTATION**

The fact that a child or a young person may be lesbian, gay, bisexual or gender questioning, is not in itself an inherent risk factor for harm. However, this group of children may be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identifies as one of these groups. Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Lesbian, gay, bisexual or gender questioning inclusion is part of our Safeguarding and Wellbeing Curriculum and there is a range of support available to help schools counter bullying and abuse.

### **Early Help Procedures**

Keeping Children Safe in Education and Working Together to Safeguard Children set out a clear expectation that local agencies and schools will work together and collaborate to identify those children with additional needs and provide support as soon as a problem emerges. Providing early help is far more effective in promoting the welfare of children – and keeping them safe – than reacting later, when any problems, for example neglect, may have become more entrenched.

We are committed to ensuring everything possible is done to prevent the unnecessary escalation of issues or problems. Children, young people and their families will be offered help when needs and/or concerns are first identified and, because of the early help offered, children's circumstances will improve and, in some cases, the need for more intrusive and intensive services are lessened or avoided. Parents are encouraged to use their own support networks and resources at the first stages of 'early help'. The school

may help in clarifying or signposting these.

Our schools will always seek to discuss our concerns with the child's family (and if appropriate, directly with the young person) to let them know what is going on and how we are trying to help. We will need consent to share information to access support. We recognise that families may also be able to explain, assist or resolve the issues themselves.

### **Stage One - Universal services for all children, young people and their families**

All children need support to learn and develop. In most cases, our schools will be able to meet the needs of a child or young person by personalising our approach, but some children require support which is additional to, or different from, what we normally provide.

### **Stage Two - Targeted early help for vulnerable children and families**

If we have tried to meet the child or young person's needs from within the full range of support we can offer without progress/success, we will now need to engage additional support from other services. In doing so, we will need to decide whether the help the child and/or family needs can be met by involving one other service or if multiple services may be required. If we decide the child's need(s) require support from more than one service (and we have consent), we will undertake an Early Help Assessment with the family or check if an Early Help Assessment has already been initiated. The Early Help Assessment is the assessment tool used to assess needs that are not being met through our existing personalised support and where a child and family would benefit from coordinated support from other services apart from our schools.

If the family or young person will not consent to share information using an Early Help Assessment (CAF) or withdraws consent for early help, we will continue to support the needs of the child and their family through ordinarily available support and personalised services.

### **Team Around the Family**

The Team Around the Family are the professionals from services we have invited to work together with the family to provide support. We aim to arrange a TAF meeting within 6 weeks of completing the early help assessment to establish a support plan and agree who is the best person to be the lead professional.

## **Child Protection Procedures**

### **Taking Action**

All concerns and disclosures should be logged onto the school's online safeguarding system where the DSL will decide what action to take. Although any staff member can make a referral to the Local Authority's Social Care Service this should only be done in exceptional circumstances, where a DSL or senior leader is not available.

Social Care should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. We will always follow up on a referral should information not be forthcoming.

### **If a Child Discloses Information to a Member of Staff**

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual their abuser may have made threats to kill or injure should they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. If a child talks to a member of staff about any risks to their safety or wellbeing, they will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at

which you do this is a matter of professional judgement. If you jump in immediately the child may think that you do not want to listen but if you leave it until the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

### **Notifying Parents and Gaining Consent**

The school will normally seek to discuss any concerns about a child with their parent/carers. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure and to seek consent to share this information with the social care team. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from Social Care.

### **Referral to Social Care**

The DSL (or another member of staff) will make a referral to Social Care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

If a child is in immediate danger or is at risk of harm, a referral should be made immediately to Social Care and/or the police via 999. The DSL will wait to hear from Social Care or the police before releasing the child to the parent or carer.

### **Record Keeping**

Record keeping is an essential part of child protection and safeguarding and across PACE we use a software package to manage this. It is vital that a record of any safeguarding concern is recorded accurately **as soon after the event as possible** and managed carefully and securely. This includes discussions and decisions made, including the rationale for those decisions e.g. even if referral was not made.

All records should be factual, objective, accurate and clear. This includes keeping copies within an electronic file of all relevant referral forms, conference reports, strategy minutes etc. It is important to remember that any information recorded can be requested as evidence and whatever you record should be done objectively and with professionalism.

Child Protection data should be securely stored with access restricted to the Designated Safeguarding Lead (and their deputy) and headteacher. We also have a clear policy on the removal of files and by whom and as part of this, we will securely store safeguarding records for 25 years after the child's date of birth.

### **Transfer of Information**

When a child moves to another school or educational establishment, all child protection records will be retained by our school. Copies of the records will be hand-delivered or emailed securely via Egress or other password protected means to the receiving DSL. This should be done within 15 working days, and we will always obtain written confirmation of receipt of these records.

Child Protection records do not form part of the pupil's educational record and are not required to be disclosed to parents/carers. Any requests from a parent/carers solicitor to have child protection records disclosed to them will be passed to either our legal advisor or we will consult with the Legal Services team at our local authority.

### **Confidentiality and Sharing Information**

All members of our staff understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence. Our staff at PACE should only discuss concerns with the designated

person, head teacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Governing bodies should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and GDPR.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a parent to see child protection records, they should refer the request to the head teacher. The Data Protection Act does not prevent our PACE school staff from sharing information with relevant agencies, where that information may help to protect a child. The school's policy on confidentiality and information sharing is available to parents and children on request.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation-technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

## Safer Recruitment

### Recruitment, Selection and Pre-Employment Vetting

Our school is committed to a culture of safe recruitment and, as part of that, adopt recruitment procedures in line with Keeping Children Safe in Education that help deter, reject or identify people who might abuse children.

The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in a school or college. Details are outlined in the PACE Disclosure and Barring Policy.

For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as most staff will be engaging in regulated activity. In summary, a person will be engaging in **regulated activity** if as a result of their work they:

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; or
- will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children.
- engage in intimate or personal care or overnight activity, even if this happens only once.

We will not allow a member of staff or volunteer to start work without the school having had sight of their DBS certificate or the school obtaining a separate barred list check (pending the DBS check being completed). Where an individual starts work in regulated activity before the DBS certificate is available, they will be appropriately supervised, and all other checks will have been completed.

Across PACE a renewed DBS check will be requested:

- every five years for staff
- every four years for governors and directors
- every three years for volunteers, agency and third-party staff

### **Pre-Appointment Checks**

Any offer of appointment made by our school to a successful candidate, including one who has lived or worked abroad, will be conditional and only confirmed on satisfactory completion of the necessary pre-employment checks. These checks are detailed within our Safer Recruitment Procedures and our DBS Policy.

### **Employment history and references**

The school will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

If a candidate for a teaching post is not currently employed as a teacher, we will check with the school, or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

The Department for Education has also issued guidance on the employment of overseas-trained teachers (<https://www.gov.uk/government/publications/employing-overseas-trained-teachers-from-outside-the-eea> ).

**Further information about Agency and third-party staff, students, volunteers and contractors can be found within our DBS Policy.**

### **Governors and Trustee**

Across PACE all Governors and Trustees are required to have an enhanced criminal records certificate from the DBS. Governance is not a regulated activity and so governors and directors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.

Governing bodies should ensure that all governors and directors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated (by this we mean at least annually).

### **Visitors**

We do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day). Leaders should use their professional judgment about the need to escort or supervise visitors.

### **Single Central Record (SCR)**

Our schools must keep a single central record. The single central record must cover the following people:

- all staff (including central staff, supply staff, and teacher trainees on salaried routes).
- all members of the governing body, directors and members.

The information that must be recorded in respect of staff members is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- an identity check.
- a barred list check.

- an enhanced DBS check/certificate.
- a prohibition from teaching check.
- further checks on people living or working outside the UK.
- a check of professional qualifications.
- a check to establish the person's right to work in the United Kingdom
- a section 128 check for leaders, governors, directors and members.

Each of our schools has its own SCR, with access to the PACE SCR, which includes all our centrally employed staff, directors and members.

We do not have to keep copies of DBS certificates to fulfil our duty of maintaining the single central record. To help our schools comply with the requirements of the Data Protection Act, where we choose to retain a copy, they should not be retained for longer than six months, or without the individual's consent. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept for the personnel file.

## **Allegations of Abuse - Staff, Supply Teachers, Volunteers and Contractors**

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer across PACE, is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. Whilst schools within PACE are not the employer of supply teachers, volunteers and contractors, all our schools will ensure allegations are dealt with properly. Where there are concerns with a supply teacher, volunteer or contractor, the school would usually take the lead and will liaise with the LADO in the same way as allegations against employed staff are dealt with.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Please refer to KCSIE 2024 for more details regarding allegations of abuse.

### **Local Authority Designated Officer (LADO)**

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers, and contractors), then:

- this should be referred to the headteacher
- where there is a concern/allegation about the headteacher, this should be referred to the chair of governors
- staff can also report their concerns directly to the local authority designated officer(s) LADO(s).

- See Appendix C for LADO contact details.

### **Supporting those involved**

Across our PACE schools, we have a duty of care to our employees. We will provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

The welfare of a child is paramount, and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject to the investigation, and

potentially for their family members. It is important we offer appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

### **Concerns or allegations that do not meet the harm threshold**

All low-level concerns are shared initially with the DSL or the headteacher. These should be recorded in writing and include the details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns should also be noted although if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. Records should be reviewed so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified.

Where a pattern of behaviour is identified, the school will decide on a course of action. This might be through the instigation of the trust's disciplinary procedures or, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, they must inform our Chief Executive Officer and make a referral to the LADO.

The headteacher should be the ultimate decision maker in respect of all low-level concerns and if they are in any doubt, they must consult with our Chief Executive Officer and the LADO.

Low-level concerns, which are shared about supply staff and contractors, should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police.

## **Monitoring and Quality Assurance of Safeguarding**

PACE Academy Trust has a Safeguarding and Child Protection Policy which is reviewed by PACE Designated Safeguarding Leaders on an annual basis and then personalised to ensure it reflects the safeguarding context of each individual school. The nominated governor for safeguarding in each of our schools must ensure that the school has personalised the policy to reflect the contextual safeguarding needs of the school. The nominated governor must also meet with the school's DSL at least twice-yearly to monitor safeguarding practice across the school.

Every PACE school completes an annual safeguarding audit to ensure compliance and identify actions to support best practice. This audit is provided to the Local Authority and the Chief Executive Officer for PACE usually by the end of the autumn term for the purposes of providing assurance and identifying next steps.

PACE schools manage their own Single Central Registers although these are saved centrally so that they are accessible to trust leaders. SCRs are regularly monitored by trust leaders and governors to ensure compliance and best practice.

Safeguarding reports are compiled by each school and presented at least twice yearly to local governing boards. The CEO and Link Trustee for Safeguarding also review these reports. A twice-yearly report to the Directors provides an overview of the main themes, lessons learned, key issues and developments relating to safeguarding.

## **Policy Review**

The Strategic Board is responsible for reviewing this policy on an annual basis once updates within KCSIE have been released in readiness for the new academic year. Following this, it is the responsibility local governing body to ensure that the policy is personalised further to reflect the individual context of the school and to ensure it is shared with all staff and uploaded onto the school's website.

## **Appendix A: Special Circumstances**

### **Trips Away from Home**

Children need to be kept safe when taking trips away from home. It is therefore important that rigorous safeguarding and child protection policies and procedures are in place, in addition to health and safety procedures, adequate insurance, etc. Please refer to our Educational Visits Policy for more information

### **External Lettings and Outside Clubs**

Outside agencies who are using any of our school premises must adhere to our Safeguarding and Child Protection Policy and associated safeguarding procedures. All outside agencies are required to submit copies of their insurance, DBS certificates, right to work documentation, own safeguarding policies, qualifications and training as appropriate. We expect all outside of school services to follow the guidance. 'After-school clubs, community activities, and tuition - safeguarding guidance for providers (publishing.service.gov.uk)'

This is non-statutory guidance for organisations or individuals who provide community activities, tuition or after-school clubs for children. These are also known as out-of-school settings (OOSS). This guidance helps providers run safe settings to ensure the welfare of the children attending them. It covers best practices on:

- safeguarding and child protection
- the suitability of staff and volunteers
- health and safety
- governance

### **Use of the Internet and Photos**

See our Online Safety and Acceptable Use Policies.

## Appendix B: Contacts and Further Information for social care

PACE has schools across Merton and Croydon, but our schools also border Lambeth, Surrey and Sutton.

### CONTACTS AND FURTHER INFORMATION

To make a referral or consult regarding concerns about a child:

#### Croydon Children's Services (MASH):

- Referral Portal: <https://ehmportal.croydon.gov.uk/web/portal/pages/help/apply/cpassess#h1>
- Urgent concerns that need an immediate same day response: 0208 255 2888 (Monday to Friday 9am to 5pm)
- Email: [masheducation@croydon.gov.uk](mailto:masheducation@croydon.gov.uk)
- Telephone Line: 0208 255 2888

Emergency Duty Team (out of hours): 0208 726 6400

You will need to submit a written referral alongside this.

#### Surrey Children's Services (Children's Single Point of Access-C-SPA):

- Referral Form: [Surrey Childrens Services Request for Support Form - Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](#)
- Phone: 0300 470 9100
- Email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)
- Consultation Line: 0300 470 9100 option 3 (Monday-Friday, 9am-5pm)
- Emergency Duty Team (out of hours): 01483 517898 or email: [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)

#### Sutton Children's Services (Children's First Contact Service- CFCS):

- Referral Form: [London Borough of Sutton Children's First Contact Service \(google.com\)](#)
- Phone: 020 8770 6001 (Monday-Friday, 9am-5pm)
- Email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)
- Consultation Line: 0300 470 9100 option 3 (Monday-Friday, 9am-5pm)
- Emergency Duty Team (out of hours): 01483 517898 or email: [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)

#### Merton Children's Services (Children and Families Hub- C&F Hub):

- Referral Form: [Children-and-Families-Hub-Request-for-Service-Form-Feb-2022.docx \(live.com\)](#) and email to: [candfhub@merton.gov.uk](mailto:candfhub@merton.gov.uk)
- Phone: 020 8545 4226 or 020 8545 4227 (Monday-Friday, 9am-5pm)
- Email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)
- Emergency Duty Team (out of hours): 020 8770 5000

**For allegations about people who work with children  
If in doubt – don't hesitate - consult.**

## Appendix C: LADO Contact Details

Croydon LADO

*LADO Service Manager: Steve Hall*

Email: [steve.hall@croydon.gov.uk](mailto:steve.hall@croydon.gov.uk)

Telephone: 0208 726 6000 ext. 24334

Mobile: 07825 830328

*LADO: Jane Parr*

Email: [jane.parr@croydon.gov.uk](mailto:jane.parr@croydon.gov.uk)

Telephone: 0208 726 6000 ext. 24817

Mobile: 07716092630

Merton LADO

*LADO: John Shelley*

Email: [lado@merton.gov.uk](mailto:lado@merton.gov.uk)

Telephone: 0208 5453187

*LADO Business Support: Jodie Louis*

Email: [lado@merton.gov.uk.cjism.net](mailto:lado@merton.gov.uk.cjism.net)

Telephone: 0208 5453179

**In any case where an adult is concerned that a child is, or may be, at risk of significant harm they must make a referral directly to the local authority's LADO.**

**If a child or other person is at immediate risk of harm, the first response should always be to call the police on 999.**