

## Safeguarding & Child Protection Policy 2022-23



All staff should have access to this policy and sign to the effect that they have read and understood its contents

|                      |  |                    |                      |
|----------------------|--|--------------------|----------------------|
| Date of last review: | September 2022   | Author:            | Head of Safeguarding |
| Date of next review: | September 2023   | Owner:             | Education Directors  |
| Type of policy:      | <input type="checkbox"/> Network-wide<br><input type="checkbox"/> Set for school<br><input checked="" type="checkbox"/> Tailored by school | Approval:          | Board                |
| School:              | Ark Conway Primary Academy   | Key Contact Name:  | Head of Safeguarding |
| Key Contact Email:   | safeguarding@arkonline.org   | Key Contact Phone: | 0203 116 7192        |

### POSITIONING WITHIN ARK OPERATIONAL MODEL

| Component  | Element      |
|--|--------------|
| <input type="checkbox"/> Strategic Leadership & Planning<br><input type="checkbox"/> Monitoring, Reporting & Data<br><input type="checkbox"/> Governance & Accountabilities<br><input type="checkbox"/> Teaching & Learning<br><input type="checkbox"/> Curriculum & Assessment<br><input checked="" type="checkbox"/> Culture, Ethos & Wellbeing<br><input type="checkbox"/> Pathways & Enrichment<br><input type="checkbox"/> Parents & Community<br><input type="checkbox"/> Finance, IT & Estates<br><input type="checkbox"/> Our People | Safeguarding |

**Ark Conway Primary Academy**  
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## Ark Conway Primary Academy

### SAFEGUARDING & CHILD PROTECTION POLICY

#### Safeguarding Key Contact leaders:

##### Local Authority:

|                  |                                |   |  |  |
|------------------|--------------------------------|---|--|--|
| <b>Principal</b> | <b>Ark's Regional Director</b> | <b>Designated Safeguarding Lead (DSL)</b> | <b>Deputy Designated Safeguarding Lead/s (DDSLs)</b> | <b>Designated Teacher for Looked After Child (LAC)</b> |
| James Elliott    | Kate Magliocco                 | Elyshia White                             | James Elliott<br>Hannah Bridges                      | Elyshia White  |

|                                    |                             |               |                       |  |
|------------------------------------|-----------------------------|---------------|-----------------------|--|
| <b>Digital Learning Lead (DLL)</b> | <b>Data Protection Lead</b> | <b>SENCo</b>  | <b>Behaviour Lead</b> | <b>Educational Visits Co-ordinator (EVC)</b> |
| Adam Claessens                     | Paulette Williams           | Elyshia White | James Elliott         | Elyshia White                                |

|                           |   |                                   |   |                           |
|---------------------------|---|-----------------------------------|---|---------------------------|
| <b>Attendance Officer</b> | <b>Lead First Aider and Mental Health First Aider</b> | <b>Ark's Head of Safeguarding</b> | <b>Nominated Safeguarding Link Governor</b> | <b>Chair of Governors</b> |
| Saira Shah                | Monique Cohen - Pepper<br>MHFA - James Elliott        | Joycelyn Thompson                 | Alison Cabot                                | Alison Cabot              |

|  |  |   |  |  |
|--|--|---|--|--|
| <b>Ark's People HR Business Partner (HRBP)</b> | <b>Ark Regional Facilities Manager</b> | <b>Local Authority Designated Officer (LADO)<br/>Inc. Contact details</b> | <b>Virtual School Head (LAC/PLAC)<br/>inc. Contact details</b> | <b>Schools Police /Community liaison Officer</b> |
| Frances Dobell                                 | Adam Satow                             | Megan Brown<br>megan.brown@lbhf.gov.uk<br>07776 673020                    | Amelia Steele<br>amelia.steele@lbhf.gov.uk<br>07771 345330     | Philippa Saleem                                  |

**What to do if you have a safeguarding concern in Ark Conway Primary Academy**

**Why are you concerned?**

For example:

- Disclosure /voice of the child /online violation/contextual
- Allegation/concern against staff /volunteer (*follow managing allegations/concerns procedure*)
- Child's appearance/inappropriate or unsuitable clothing
- Behaviour change /overhear conversation/unseen/truancy
- Witnessed concerning behaviour/ risk to self and others

**Immediately record your concern on 'Impero EdAware' online recording tool or on a 'Cause for Concern' form (external/visitors only)**

**FORWARD to DSL WITHOUT DELAY**

- Clarify concerns if necessary  
(**TED: Tell, Explain, Describe**)
- Use child's own words
- Sign and date your records
- Reassure the child (remain with child if in immediate danger)
- Seek support for yourself if required from DSL

**Designated Safeguarding Lead reviews referral and makes a decision about next steps. Feedback (on a need-to-know basis) is given to staff/ referrer on next steps**

**Referral /Further discussion**

- Consider whether child is at immediate risk of harm e.g. unsafe to go home
- Discussion/refer to other agencies as appropriate e.g. Inter-agency referral
- If allegation against professional inform Principal - LADO notification, Tel call, complete form
- If allegation against Principal inform RD and Ark Head of Safeguarding
- If unsure, then consult with Ark Head of Safeguarding /HR Business partner

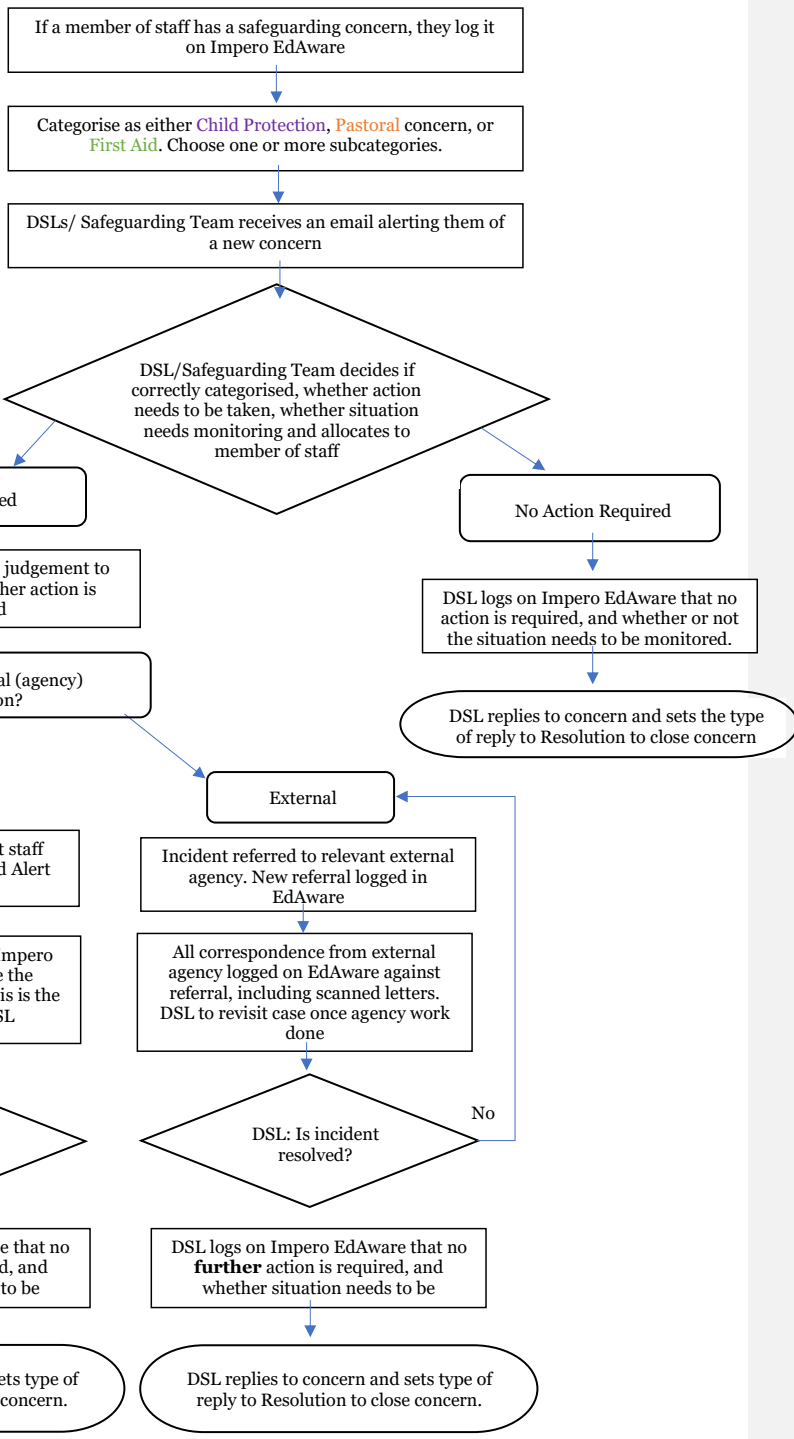
**In School Monitoring Process by assigned person or DSL**

- What you are monitoring – Behaviour, trends, appearance, interventions etc.
- How long will you monitor? Timeline
- Where, how and to whom will you feedback? Staff/referrer/Principal
- Where will you record? Impero EdAware, Bromcom, Schlorapack, Provision Map
- Inform parent/carer of support provided? Meetings/Support Plans

**Record decision**  
**Child deemed at risk of significant harm or the likelihood of danger of harm and or risk. Decision made to refer to Children's Services (MASH/EARLY HELP/CAMHS)**

**At all stages the child's circumstances will be kept under review**  
**The DSL/Staff will re-refer if required to ensure the child's safety is paramount**

**Impero EdAware Logging and Following Up on Safeguarding Concerns and Cases**



## 1. INTRODUCTION AND ETHOS

Ark Conway Primary Academy is a community and all those directly connected (staff, governors, parents, families and pupils) have an essential role to play in making it safe and secure. Ark Conway Primary Academy recognises our moral and statutory responsibility to safeguard and promote the welfare of all children with their best interests at the centre of our work.

At Ark Conway Primary Academy we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Ark Conway Primary Academy recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly about anything that worries them; and enable them to feel confident that they will be listened to. Adults in our school take all welfare concerns seriously and are alert to the signs of abuse and neglect; and follow our procedures to ensure that children receive effective support, protection and justice.

Our school's core safeguarding principles are:

- That school is an important part of the wider safeguarding system for children.
- It is a whole school responsibility to safeguard and promote the welfare of children as its paramount concern.
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All children have a right to be heard and to have their wishes and feelings taken into account.
- All staff understand safe professional practice (inc. role requirements) and adhere to our code of conduct and other associated policies.
- All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance.

There are four main elements to our safeguarding policy:

- **Prevention** (e.g., positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);
- **Protection** (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);
- **Support** (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
- **Working with parents and other agencies** (to ensure appropriate communications and actions are undertaken).

This safeguarding policy requires:

- all staff must be aware of their statutory responsibilities in respect to safeguarding.
- all staff **must** read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#) (2022) and review this guidance at least annually
- all staff **must** sign a declaration at the beginning of each academic year or at induction for in year starters to say that they have read and reviewed KCSIE,
- all staff members and new governors **must** receive appropriate safeguarding and child protection training (including online safety) which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (including online safety) (for example, via emails, e-bulletins and staff meetings), termly, and at least annually, to provide them with the skills and knowledge to safeguard children effectively
- all staff are properly trained in recognising and reporting safeguarding issues
- all staff to take appropriate action in a timely manner to safeguard and promote children's welfare
- all staff and new governors **must** complete the Ark online KCSIE module to assist further to understand and discharge their role and responsibilities.
- all staff must complete the asynchronous Digital Awareness module that can be found on the Ark Learning Platform.
- all DSLs, DLLs and PHSE Leads must attend or watch the recording of the synchronous Digital Awareness training, which will occur in September/October.



- all schools must have a safeguarding induction and an annual training plan.
- all DSLs are required to read and ensure implementation of the school Emergency Response plan and related guidance and risk assessments.
- staff and new governors should complete [the e-learning training module on Prevent](#), produced by the Home Office to equip individuals with the knowledge necessary to help prevent vulnerable people from being exploited and drawn into terrorism and having extremist views.
- all staff **must** read and sign to indicate their understanding of the Ark IT Acceptable Use Agreement.
- all schools **should** undertake an annual internal safeguarding audit process and will be required to complete their LA section 175 audit.
- all schools **should** reference the advice - Sharing nude and semi-nudes: advice for education settings working with children and young people (Dec 2020)
- all staff members should be informed of and how to access their school's safeguarding and child protection policy and procedures (Appendix A of their safeguarding and child protection policy), school's behaviour policy and advice from their Local Authority safeguarding local three partner approach procedures. *(inserted in Appendix A- locally agreed multi-agency procedures that have been put in place by our local three partner approach)*

**Commented [JT1]:** Outbreak management plan removed. The Emergency Response Plan is a statutory document so this would now be our network policy that schools follow.

## 2. SCOPE

This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff and third-party contractors (whose employees or sub-contractors have access to school premises), governors, volunteers and trustees working in or on behalf of the school, including those from the Ark central team. All references in this document to 'staff' or 'members of staff' or 'adult' should be interpreted as relating to all those specified above. Staff also includes those individuals who educate pupils off-site and when individuals undertake an educational visit with pupils, unless otherwise stated.

Rather than duplicating all content from Keeping Children Safe in Education (September 2022) in this policy, it should be understood that the school will always refer to KCSIE as the benchmark for all safeguarding practice and decision-making.

## 3. CONTEXT

- This policy has been developed in accordance with the principles established by The Children Act 1989 (and [2004 amendment](#)), as amended by the Children and Social Work Act 2017 and complies with statutory and legislative requirements and guidance that seeks to protect children including:
  - [Keeping Children Safe in Education \(2022\)](#)
  - [Working Together to Safeguard Children \(2018\)](#)
  - [Governance Handbook](#)
- 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 Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- Education and Training (Welfare of Children) Act 2021
- What to do if you are worried a child is being abused DfE (March 2015)
- Information Sharing Advice for practitioners DfE (July 2018)
- Safer Working Practice guidance for adults who Work with Children and Young People in Education Settings (Feb 2022) <https://saferrecruitmentconsortium.org>
- Use of reasonable force: Advice for head teachers, staff and governing bodies (July 2013 reviewed July 2015)
- Special educational needs and disability code of practice: 0 to 25 years (Jan 2015)
- The Data Protection Act 2018 and General Data Information Protection Regulations
- Sexual violence and sexual harassment between children in schools and colleges DfE (Sept 2021)
- Relationships education, relationships and sex education (RSE) and health education (DfE, July 2020)
- Education Inspection Framework and handbooks (April 2021)
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- [Statutory framework for the Early Years Foundation Stage](#) - meets requirements relating to safeguarding and welfare in the early years (Feb 2018)
- Inspecting safeguarding in early years, education and skills (updated 24<sup>th</sup> August 2021)

This policy is also based on:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- Section 175/157 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to arrange to safeguard and promote the welfare of all children who are pupils at a school, or who are pupils under 18 years of age, such arrangements will have regard to any guidance issued by the Secretary of State.
- The arrangements agreed and published by our 3 local safeguarding partners
- Complying with our funding agreement and articles of association.

#### 4. DEFINITION OF SAFEGUARDING

"Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil's welfare, health and safety." (Education Inspection Framework and handbooks - April 2021)

**Safeguarding and promoting the welfare of children, (Paragraph 4 KCSIE 2022) means:**

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

**Child protection** is part of this definition, an aspect and refers to activities undertaken on how we respond to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. See [Appendix A of this policy](#) explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. [Appendix A](#) defines neglect in more detail.

**Children** include everyone under the age of 18.

**Children in need:** A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local safeguarding partners are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Where appropriate we will work with the procedures in place through the three local safeguarding partners.

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what’s appropriate and which terms to use on a case-by-case basis.

Ark Conway Primary Academy acknowledges that safeguarding is what we do for all children.

Safeguarding covers more than just child protection and schools are charged with ensuring that the child is looked at holistically and at the centre of decision-making within each area below (but not limited to):

- Anti-bullying/child-on-child policies
- Child protection
- Early Help
- Staff conduct & Safer work practice
- Curriculum inc. RHSE, online safety, digital resilience, PSHE, character
- Attendance, PA, Suspensions & Exclusions, Children Missing Education, Transition,
- Off-site provision
- Post 16
- EYFS
- Health and Safety
- IT Filtering and Monitoring
- Behaviour Management
- Governance
- SEND
- Pastoral & Inclusion
- Training
- Whistleblowing
- A listening School/Service
- Specific forms of abuse and safeguarding issues
- Complaints/ parental concerns
- Allegations made against/ Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors
- The School Environment Inc. Building & Security
- Safer recruitment, selection and appointment

The school further acknowledges that this policy will also incorporate a range of specific forms of abuse and safeguarding issues including (but not limited to):

- Additional advice and support of Bullying including cyberbullying
- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children missing from home or care
- Children with family members in prison
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- Child Criminal Exploitation (CCE) and vulnerable adult's county lines
- Child Sexual Exploitation (CSE)
- County lines
- Cybercrime
- Drugs & alcohol misuse
- Domestic abuse / Relationship abuse
- Fabricated or induced illness
- Faith based abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gender based violence / violence against women and girls (VAWG)
- Hate
- Homelessness

- So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)
- Mental health
- Modern Slavery and the National Referral Mechanism
- Child on child abuse
- Preventing youth violence and gang involvement
- Preventing radicalisation
- The Prevent duty
- Channel
- Private fostering
- Additional support
- Serious violence
- Sexual violence and sexual harassment between children in schools and colleges
- The response to a report of sexual violence or sexual harassment
- Trauma
- Up skirting

(Also see Annex B within 'Keeping children safe in education' 2022 and Appendix C of this policy).

Every member of staff at Ark Conway Primary Academy recognises that children experiencing specific forms of abuse and safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks. Staff members are aware that children might not tell them about their abuse and that it maybe that a member overhears a conversation or the child's behaviour changes.

## 5. RELATED SAFEGUARDING POLICIES

We are aware that safeguarding is fundamental to the welfare of all children in our care. This policy is therefore one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies, guidance documents or procedures as listed below. These documents should be available on the Ark Library, the [policy index](#) or [Statutory Guidance Index](#), a few are sections within other policies.

- **Behaviour Management, linked to the Use of Physical Intervention** – In house behaviour policy on individual school website
- **Searching, screening and confiscation** advice for schools – (DfE guidance Sept 2022) is also covered in our behaviour policy on individual school website
- **Online Safety and Digital awareness** – covered within digital strategy, section within the Safeguarding policy Appendix A
- **Anti-Bullying procedure** – procedure is on statutory guidance index
- **Managing harmful behaviours** – document on Ark Library (Culture & Ethos section)
- **Data Protection and Information Sharing** – on the Policy Index
- **IT Acceptable Use Agreement** –on the Policy Index
- **Image Use** – no separate document, section included in IT Acceptable Use Agreement
- **Drugs & substance misuse**– Covered within schools PHSE policy
- **Supporting Transgender Pupils Code of Practice** – guidance is on statutory guidance index
- **Relationships education, relationships and sex education (RSE) and health education** – each school writes own policy - guidance on the statutory guidance index
- **Health and Safety** – on policy index
- **Attendance (Children Missing Education)** – attendance policy on policy index, CME covered within the Safeguarding policy
- **Risk Assessments** (e.g., school trips, use of technology,) – guidance and templates on Ark Library within relevant team
- **First Aid and Accidents** – policy on index

- **Procedure for Managing Allegations made against/ Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors** – procedure on Statutory Guidance Index
- **Code of Conduct for Staff** – each school writes their own, People Team provide advice
- **Complaints** – on policy index
- **Safer Recruitment** – no separate policy, sections within the Safeguarding policy (Appendix D) and Recruitment & Appointment Policy
- **Whistleblowing** – on policy index

#### **Supporting Guidance (to be read and followed alongside this document)**

- The Children and Families Act 2014
- SEND code of practice: 0 to 25 years 2015 (update April 2020)
- Mental Health & Behaviour in Schools 2018
- Disqualification under the Childcare Act 2006 (DfE Aug 2018)
- School attendance: guidance for schools (Aug 2022)
- School suspensions and permanent exclusions (July 2022)
- Criminal Exploitation of children and vulnerable adults: County Lines guidance July 2017
- Teachers Standards 2012
- ‘When to call the police’ Guidance for schools and colleges, produced by the National Police Chiefs Council (NPCC) 2020.
- Home Office’s Preventing youth violence and gang involvement (Aug 2013)
- Domestic Abuse Act 2021
- DfE Designated teacher for looked after and previously looked after children 2018
- Children and Social Work Act 2017.
- DfE “Teaching Online Safety in Schools” (June 2019)
- Sharing nude and semi-nudes: advice for education settings working with children and young people (Dec 2020)
- DfE Data Protection: A Toolkit for Schools
- LA Safeguarding Partnerships arrangements

#### **6. EQUALITY STATEMENT**

Some children have an increased risk of abuse and additional barriers can exist for some children with respect to recognising it or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. All staff are particularly alert to the potential need for early help for a child who:

- has special educational needs (SEN) or disabilities or health conditions.
- has experienced challenges during Covid-19 pandemic
- has special educational needs (whether or not they have a statutory education, health and care plan - EHCP). These children may be more prone to peer group isolation than other children and therefore additional pastoral support is provided.
- is a young carer
- is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups
- is at risk of Child abduction, community safety incidents or exploitation
- whose parent/carer has expressed an intention to remove them from school to be home educated
- is showing signs of 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.
- is showing signs of Trauma

- has a bereaved parent, grandparent, family member, friend or prominent community link,
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- has English as an additional language
- is post 16 and homeless/sofa surfing
- is frequently missing/goes missing from care or home
- is misusing drugs or alcohol or living with parents who misuse
- is known to be living in difficult circumstances, for example living in temporary accommodation or where there are issues such as substance abuse, adult mental health problems or domestic abuse
- is at risk of FGM, sexual exploitation, forced marriage, radicalisation or online grooming
- is an asylum seeker
- is a looked after child, previously looked after or has returned home to their family from care (a 'care leaver')
- is a privately fostered child
- has a parent sent to prison. The National Information Centre of Children of Offenders (NICCO): <https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## 7. KEY ROLES & RESPONSIBILITIES

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors at Ark Conway Primary Academy and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### **The Ark Schools Trust Board**

The Ark Schools Board retains statutory responsibility for ensuring that all legal responsibilities in connection with Safeguarding are discharged. The Board appoints a Safeguarding Link Trustee to act as the link between the Trustees and Executive team.

### **Ark's Head of Safeguarding**

The Head of Safeguarding holds responsibility for overseeing day-to-day safeguarding matters within the network, and will ensure schools have appropriate safeguarding processes, practices and relevant training to safeguard and promote the welfare of children.

The Head of Safeguarding will provide schools with high quality safeguarding support, advice and guidance tailored to individual needs and requirements, ensuring schools meet their statutory responsibility to keep children safe.

Ark recognises that staff anxiety around child protection can undermine good practice and so the Head of Safeguarding will ensure that there are established clear lines of accountability and case management and supervision to support staff with this process.

The Head of Safeguarding will ensure that the annual safeguarding Audit process is effectively carried out and report any inadequacies to the Network' executive team, Safeguarding Link Trustee, Regional Director, Principal, DSL and Safeguarding Link Governor. This will also form part of the report to inform the Trust Board.

### **Principal/Head of School**

The Principal/Head of School is responsible for the implementation of this policy, including:

- ensuring that the policies and procedures adopted by the Ark Schools Board and Local Governing Body, associated with protecting children are fully implemented, understood and followed by all staff and adhered to at all times.
- ensuring that staff (including temporary staff) and volunteers are informed of Ark Conway Primary Academy systems which support safeguarding, including this policy, as part of their induction
- ensuring that staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- ensuring that the DSL and DDSLs are properly supported in their role with adequate time, training and resources, and that there is always adequate cover if the DSL is absent.
- communicating this policy to parents/carers when their child joins the school and via the school website
- ensure that children are taught about safeguarding including online safety and resilience, as part of providing a broad and balanced curriculum. Ark Conway Primary Academy RSE policy is in Appendix A of this policy.
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- ensuring that all staff undertake appropriate safeguarding and child protection training and the updating of content of the training regularly
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, (refer to Ark procedure on Allegations of abuse/concerns made against teachers, and other staff including supply teachers and volunteers) where appropriate and that the Head of Safeguarding is emailed to inform about any LADO referrals
- making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- ensuring the relevant staffing ratios are met, where applicable (Early years and primary settings)
- making sure each child in the Early Years Foundation Stage is assigned a key person (Early years settings)
- appointing a Designated Lead for online safety with appropriate skills, interest and expertise regarding online safety and curriculum
- ensuring their school maintains up to date records of all safeguarding concerns, using Impero EdAware as their sole recording tool for concerns, LADO referrals, physical restraint incidents and first aid incidents
- ensure their school maintains secure monitoring and filtering solutions for its school's devices that can alert the DSL as soon as a problem emerges

Where alternative provision is in place, the Principal/Head of School are responsible for obtaining written confirmation from that provider that appropriate safeguarding checks have been carried out on individuals working in the provision, i.e. those checks that the school would otherwise perform in respect of its own staff.

Where pupils undertake work experience, the Principal/Head of School is responsible for ensuring that appropriate safeguarding procedures are in place in relation to supervising adults, in line with guidance in KCSIE 2022 paragraphs 328-333.

The Principal/Head of School and DSL are responsible for communicating this policy during induction to new staff and to parents when a child join Ark Conway Primary Academy and via the school website.

**Designated Safeguarding Lead (DSL /Deputy Designated Safeguarding Lead (DDSL)**



The school has appointed a member of the senior leadership team, as the Designated Safeguarding Lead (DSL). Ark Conway Primary Academy DSL (see contacts page 4). The DSL takes lead responsibility for the day-to-day oversight of safeguarding and child protection systems and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, the DDSLs – (see contacts page 4– will act as cover. If the DSL and DDSLs are not available, the Head of School/Principal or assigned lead will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so, ensuring the school is appropriately represented (including Child Protection conferences).
- Contribute to the assessment of children by appropriately sharing information about pupil's welfare, safeguarding or CP concerns with relevant staff and external services.
- Help promote educational outcomes, academic progress by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff.
- Contribute to the review of records relevant to freedom of information and subject access requests.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour, violence and harassment

The DSL will also:

- Keep the Head of School/Principal informed of any safeguarding topics, provide regular data reports, analysis of cases, pattern and trends and informed of any serious safeguarding issues relating to children and staff.
- Liaise with Ark's Head of Safeguarding in reporting serious safeguarding issues relating to children and in matters relating to staff.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's services colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of police attendance in school, investigation or search

The DSL and DDSLs will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. The DSL and DDSLs training will be updated formally every two years but may have refresher training at regular intervals, at least annually, to keep up with any developments relevant to their role.

Additionally, DSL and DDSL knowledge and skills will be updated regularly through a variety of other methods, e.g. e-bulletins and briefings, organising and participating in conferences, local hub meetings, other identified training, supervision, Ark network training and Ark DSL hub meetings.

The school has appointed additional staff to deputise for the DSL. The Deputy DSLs have attended appropriate training, which enables them to be fully conversant and to fulfil this role. Whilst the activities of the designated safeguarding lead may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead and this responsibility will not be delegated.

It is the role of Ark Conway Primary Academy DSL to:

- **Maintain accurate child case records:**  
(recording concerns, actions, referrals and updates on Impero EdAware – safeguarding recording tool, oversight and quality assurance of all cases inc. LAC/PLAC and pupils with a social worker, Behaviour on Bromcom/Scholarpack, Manage and monitor the school's part in Early Help / Child in Need / Child Protection / TAC/ TAS plans, Monitoring violations via SENSO on devices)
- **Raise awareness about safeguarding:**  
(annual audit, training, briefings, network hubs, DSL Champions, digital strategy/awareness & resilience)
- **To make referrals and liaise with other services:**  
(to strengthen safeguarding response to Local Authority (MASH/localised), Early Help, leaver/in-year transition, CAMHS, counselling –universal, targeted, specialist interventions and safeguarding partners and other agencies and Professionals as necessary)
- **To support and advise staff**  
(Act as the central contact point for all staff to discuss any safeguarding concerns, code of conduct, position of trust, staff concerns, allegations & vulnerabilities, duty of care, professional curiosity and well-being)

Ark Conway Primary Academy DSL and DDSLs follow the full role and responsibilities as set out in 'Keeping Children Safe in Education' 2022, Annex C.

### **Local Governing Body (LGB)**

The LGB, have read and will follow KCSIE 2022 and will provide independent advice and oversight to their school.

The LGB performs a vital role in monitoring compliance and challenging the academy to ensure that best practice is followed. Therefore, all governors must recognise their safeguarding duties towards children in their school. LGB governors are required to sign in acknowledgement of this responsibility upon joining their LGB and this is to be reviewed annually

The LGB has nominated a governor for safeguarding named on contacts page 4 of this policy. The nominated safeguarding link governor will undertake independent oversight of school level delivery in safeguarding by having termly meetings with the DSL, being part of the school safeguarding audit process and presenting the audit and end of year reports to the LGB.

### **Members of Staff**

All members of staff have a responsibility to:

- provide a safe environment in which children can learn
- maintain an attitude of '**it could happen here**' where safeguarding is concerned and to always act in the best interests of the child
- understand Ark Conway Primary Academy systems which support safeguarding, including this child protection and safeguarding policy, the staff [behaviour policy/code of conduct], the role and identity of the designated safeguarding lead (DSL) and [deputy/deputies], the behaviour policy, the online safety policy) and the safeguarding response to children who go missing from education
- record promptly any safeguarding concern, first aid incident, online violation or physical restraint incident that you have about a child on Impero EdAware the safeguarding all-in-one online recording tool or a cause for concern form (volunteers and external visitors) (WTD charts– pg. 5 & 6).
- understand the early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment. Support can be given to a family when a problem first emerges, it can be provided at any stage in a child or young person's life.

- understand the process for making referrals to local authority children's services and for statutory assessments that may follow a referral, including the role they might be expected to play
- know what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- know the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- understand the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- know that children can be at risk of harm inside and outside of their home, at school and online
- know that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- provide a safe space for pupils who are LGBT to speak out and share their concerns
- know what to look for to identify children who need help or protection
- believe a child or young person to be at significant risk, you should get in touch with the DSL or DDSL immediately.
- reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- know your DSL and DDSL and work with them in carrying out your safeguarding duties.
- provide additional information to social workers or other agencies following referrals if directed to by the DSL or DDSL
- ensure all children are able to develop appropriate strategies to recognise and respond to risk and build resilience
- use information provided by DSL to inform pupil's academic progress and pre-empt challenges
- allow adequate support to be in place with staff team
- recognise and know what to do if they identify a safeguarding issue or a child who may be in need of extra help or if a child tells staff they are being abused or neglected, or a child who is suffering or are likely to suffer significant harm including specific issues, such as CCE/County lines. This includes the experiences of girls being criminally exploited can be very different to boys, indicators of CCE may also be different for girls.
- recognise the signs of different types of abuse and neglect, as well as specific forms of abuse and safeguarding issues such as child sexual exploitation (CSE), FGM, county lines and radicalisation. See 'Keeping Children Safe in Education' 2022, Annex B. [Specific forms of abuse and safeguarding issues](#)
- provide the appropriate safeguarding response to pupils who go missing from education.
- take appropriate action to prevent safeguarding concerns escalating and work with other services as needed to safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- recognise safeguarding incidents and/or behaviour can be associated with factors outside the academy and can/or occur between children outside of these environments. These are the contextual factors i.e. wider environmental factors that are present in a child's life that are or may be a threat to their safety and or welfare.
- be aware of and take appropriate action to raise concerns regarding poor or unsafe

- practice, staff conduct or potential failures in the school safeguarding regime (this may include accessing the school whistleblowing policy and or procedure on allegations made against/ concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors)
- respond to and refer any concerns about children or other members of the community in accordance with this policy
- contribute towards, read and adhere to the school policies
- follow safer recruitment practices of staff involved in recruitment and selection

All members of staff at Ark Conway Primary Academy know what to do if a child tells them he/she or that another peer or sibling is being abused or neglected. Members of staff know to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child.

**The welfare and safety of children are the responsibility of all staff in school and ANY concern for a pupil's welfare MUST always be reported to the Designated Safeguarding Lead or DDSL.**

If outside of school hours staff have concerns about a child or if you're worried a child in the community is being radicalised, is involved in or at risk from gangs or any other child safety concerns (as opposed to a child being in immediate danger or harm) the NSPCC has a dedicated helpline you can contact: 0800 800 5000 or you can contact the charity at: [help@NSPCC.org.uk](mailto:help@NSPCC.org.uk). If a child is in immediate danger, call the police on 999 straight away or call 101 for non-emergency concerns.

### **Children and young people**

Children and young people (pupils) have a responsibility to:

- contribute to the development of school safeguarding policies
- read and adhere to (at a level appropriate to their age and ability) the schools safeguarding policies and procedures and other related policies
- to be given the opportunity to learn about safeguarding
- read, sign and adhere to the Home School Agreement that outlines the use and breach of Ark school devices
- navigate digital tools safely (including SPArky), be critical about the information they find online, and use digital tools to enhance their learning and experiences. They know what to do if things go wrong and how to seek help from an appropriate adult if they feel at risk of harm, and support others that may be experiencing safeguarding concerns by reporting to an appropriate adult
- develop and take responsibility (at a level that is appropriate to their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online safety, remote learning and digital resilience
- follow the schools' behaviour policy and other related policies, procedures and guidance to ensure you keep safe both in and out of school.

### **Parents and Carers**

Parents/carers have a responsibility to:

- Read the relevant school policies, procedures and guidance, encouraging their child/ren to adhere to them, and adhering to them themselves where appropriate
- Discuss safeguarding issues with their child/ren, support the school in their safeguarding approaches, and reinforce appropriate safe behaviours at home
- Identify changes in behaviour which could indicate that their child/ren is at risk of harm online or contextual and raising these concerns with school
- Seek help and support from the school, or other appropriate agencies, if they or their child/ren encounters any safeguarding concern

- Contribute to the development of the school’s safeguarding policies and other related policies

Parents can support their children to navigate the internet safely, understand the risks and know what to do if things go wrong. Parents know how to support their child’s learning at home and know what to do if things go wrong.

At Ark Conway Primary Academy the DSL will ensure parents are signposted to SPArk website and provide parent pack and promote parent workshops. DSLs follow good practice guidance on involving parents where safeguarding issues arise online.

Ark Conway Primary Academy will undertake appropriate discussion with parents/carers prior to any proposed interagency involvement unless the circumstances preclude this action. If we believe that notifying the parents/carers would increase the risk to the child, or exacerbate the situation, we will seek advice from the three local safeguarding partners.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

Ark Conway Primary Academy will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers plus one other in case of emergencies. Parents should remember to update the school as soon as possible if the numbers change.

Parents can obtain a hard copy of the school Safeguarding and Child Protection Policy and other related policies on request to the school and can view them via the school website.

## 8. RECOGNITION AND TYPES OF ABUSE AND NEGLECT

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

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

**The most up to date definitions and possible indicators and signs of abuse are found in Appendix A of this policy. Staff should also refer to ‘Signs and Indicators of Abuse and Neglect’ and Safeguarding issues (Keeping Children Safe in Education (September 2022) Paragraphs 21-50) and ‘What to do if you are worried a child is being abused’ 2015.**

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

Members of staff are aware that child welfare concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. For example, children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger. An adult or adults, or another child or children may abuse them. Their peers, family members, by unknown, or in some cases unidentifiable individuals, may abuse children via the internet. In the case of honour-based abuse, including forced marriage and female genital mutilation, children may be taken out of the country to be abused. An abused child may often experience more than one type of abuse, as well as other difficulties in their lives.

Abuse and neglect can happen over a period of time but can also be a one-off event. This can have major long-term impacts on all aspects of a child’s health, development and well-being.

Harm can include ill treatment that isn’t physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children

The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Parental behaviours’ may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions

or concerning parental behaviour's; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.

Ark Conway Primary Academy recognise that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL).

Ark Conway Primary Academy staff recognise that knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school or persistent absence or unknown leavers can be an indicator of abuse and neglect and may raise concerns about other safeguarding issues, including the criminal exploitation of children. We monitor attendance carefully and address poor or irregular attendance without delay.

### **Behaviour, attendance and SEND**

At Ark Conway Primary Academy staff recognise that a key part of safeguarding is proactive, early intervention. To ensure that vulnerable pupils are identified and supported at the earliest opportunity, our staff pay particular attention to early risk factors, particularly those relating to behaviour, mental health and disengagement from education. It is important that all staff are aware of the link between behaviour, attendance, SEND and safeguarding issues and how they may indicate a child is at risk of harm. School staff must monitor and analyse behaviour and attendance data frequently in order to detect emerging patterns of behaviours or absence.

#### **Behaviour**

**Staff should be aware of all Academy procedures in place that monitor children's behaviour and wellbeing.** Staff should take a data informed approach to identifying key trends and patterns emerging throughout the year. Whole academy and individual level interventions should be identified and actioned swiftly to ensure that risks are reduced. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and sharing nudes and semi-nudes images and or videos can all be signs that children are at risk. Staff should also pay particular attention to less overt behaviour patterns, such as children who appear to be withdrawn or isolated. It is important for our DSL to be involved in discussions and reviews of the behaviour process and policy. At whole academy level, DSLs play an important part in assisting in developing strategic, proactive work around behaviour issues such as bullying, harassment and contextual safeguarding risks. At an individual pupil level, DSLs can support with decisions about referrals and interventions, and are well placed to be able to make links with current or historic safeguarding risk factors and the behaviour of the child.

Ark Conway Primary Academy have their own behaviour policy which sets out expectations for appropriate behaviour of staff and pupils. There should be clear guidance relating to anti-bullying and harassment, use of reasonable force, risk assessments relating to harmful sexual behaviour.

#### **Attendance**

**Ark Conway Primary Academy staff must be aware of all procedures that monitor children's attendance and absences, including unauthorised absences, authorised absences, punctuality to school, punctuality to lessons and on-site truancy.** All tracking and monitoring of attendance should be completed in 'real time'. Reports of non-attendance, lateness or truancy should be communicated to parents and relevant external agencies as soon as possible. Reporting should not wait until the end of the school day.

**All staff should be aware that children going missing, particularly repeatedly, can act as a significant warning sign.** Children going missing may be an early indicator of a range of abuse, such as neglect, including sexual abuse, child criminal exploitation, mental health difficulties, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Children missing from education (CME) may be at a significant risk of:

- not meeting their academic potential and underachieving

- becoming NEET (not in employment, education or training) in later life
- being victims of harm, abuse or exploitation
- involvement in criminal or gang-related activity.

Ark Conway Primary Academy staff recognise that there is a higher proportion of children recorded as missing education when there is a link to poverty, deprivation or involvement with social services.

**All Ark Conway Primary Academy staff should be taught how to take registers using the Academy’s centralised system.** Staff should also be clear about any timeframes for submission of AM/PM or lesson registers. Registers should be taken quickly and submitted via the central system to ensure that absences are flagged at the very earliest opportunity. The central system must be monitored at key points throughout the course of the day to ensure that anomalies are identified and missing pupils are located and accounted for. This should happen consistently throughout the course of the day, at each registration point.

**Emerging patterns of non-attendance should be identified quickly and followed up using the Academy attendance and punctuality protocols.** Joined up working between the DSL, Attendance Leads and Pastoral Leads is crucial in identifying and investigating any safeguarding risk factors. There should be frequent communication between these colleagues throughout the course of each term. Communication should include summaries of concerns and any specific actions taken to address non-attendance and reduce associated risks. It is vital that these concerns, discussions and actions are well documented, and that actions are reviewed at regular intervals.

#### **SEND**

At Ark Conway Primary Academy we know that children who have experienced abuse or trauma are likely to require additional support at some point in their education.

KCSIE 2022 states 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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems”.*

At Ark Conway Primary Academy staff recognise the need to pay particular attention to SLCN needs, such as language delays and social communication needs.

It is essential that the SENCO and DSL share information throughout the course of each term and work in partnership to quickly identify and action the most appropriate level of support for children at risk. This is key in ensuring that holistic support is in place for our vulnerable children, at the very earliest opportunity.

**It is important that SEND needs do not automatically indicate abuse or risk of abuse.** However, it is important to ensure that information is shared quickly so that professionals can build a comprehensive well-rounded view of the child’s needs.

#### **9. SAFEGUARDING AND CHILD PROTECTION PROCEDURES**

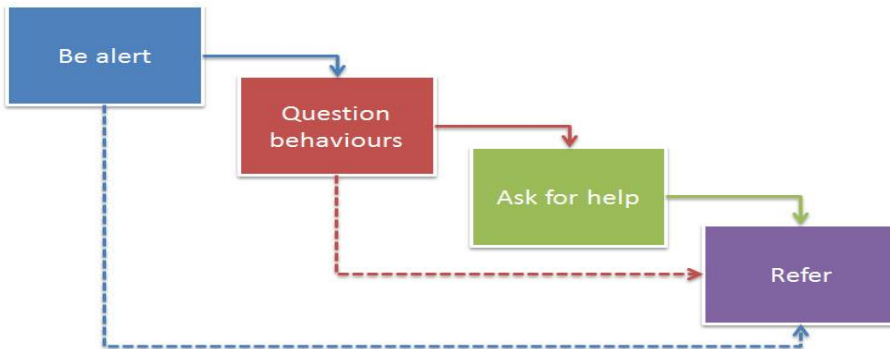
Ark Conway Primary Academy adheres to their Local Authority Safeguarding three partners approach Procedures. The full procedures and additional guidance relating to specific safeguarding issues can be found on the LA Safeguarding Partnership website.

Additional guidance for staff includes

- ‘What to do if you are Worried About a Child Being Abused’ (DfE 2015)
- Information Sharing (2018)

‘What to do if you are worried about a child being abused’ (DfE 2015) p.12 (s.24) identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect.

All members of staff are expected to be aware of and follow this approach:



It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children's social care and/or the police.

**The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer** to children's services and/or the police **immediately**, if you believe a child is suffering or likely to suffer from harm or is in immediate danger. **Anyone can make a referral** e.g. GOV.UK webpage for reporting child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

Tell the DSL as soon as possible if you make a referral directly to an external agency.

It is the responsibility of the DSL to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases). This includes the need to make referrals to partner agencies and services.

- To help with this decision s/he may choose to consult with the LA multi agency safeguarding hub (MASH) / social care duty team/ Early Help team.
- Advice may also be sought from Ark Head of Safeguarding.
- Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these.

All members of staff are made aware of the Early Help process and understand their role within it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

If Early Help is assessed to be appropriate, then the DSL will support staff members involved with the family in liaising with other agencies and submitting an Early Help Notification Form. The DSL will keep all early help cases under constant review and will consider making a referral to social care if the situation does not appear to be improving for the child. New referrals to services will be made using the agreed LA multi agency referral form.

#### **When to call the police (NPCC)**

Ark Conway Primary Academy follows the advice 'When to call the police' which covers incidents on school premises where pupils have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police and aims to support schools and college to make defensible decisions when considering whether to involve the police.

This advice covers the following situations:

- Assault
- Criminal damage



- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons.

**In all but the most exceptional circumstances, parents /carers will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral to the LA social care team being necessary, parents/carers will be informed and consent to this will be sought unless there is a valid reason not to do so or it will place the pupil at further harm or risk.**

#### **10. RECORD KEEPING**

- **Impero EdAware**

Staff will record any safeguarding concern, first aid incident or physical restraint incident that they have about a child on Impero EdAware the safeguarding all-in-one online recording tool. Schools may also have a safeguarding incident/concern form for volunteers, supply teachers, extended staff or visitors who do not have a school email address account. These forms are held on the shared drive, in the staff room, in the main office or with the DSL. All referrals must be passed without delay to the DSL. Records will be completed as soon as possible after the incident/event, using the child's words where necessary, and will be signed and dated.

All staff at Ark Conway Primary Academy are trained on the use of Impero EdAware. It forms part of the induction process for staff as well as within the annual safeguarding training, which is delivered to all staff.

All disclosures and concerns recorded on Impero EdAware allows school to manage all areas of safeguarding and child protection, including pupil casework, add meetings to a child's chronology, staff training, first aid and physical restraint incidents. This allows immediate follow up and management by the DSL on any issue.

The Ark schools' Head of Safeguarding can access these folders, so if a similar case was to occur, as well as being alerted by the DSL (case pertaining to a pupil, Principal for one pertaining to staff/supply, volunteer), they would be able to track the case through EdAware. The Ark schools' Head of Safeguarding would contact either the DSL/Principal if there was any concern regarding a lack of information, cases not resolved or updated or if it appeared, there was a concerning pattern developing.

If members of staff are in any doubt about recording requirements staff must discuss their concerns with the DSL.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in school. Safeguarding records are kept in accordance with data protection legislation and retained centrally and securely by the DSL and are shared with staff on a 'need to know' basis only.

- **SENSO**

At Ark Conway Primary Academy SENSO our solution to support safeguarding monitoring of remote learning and school-based devices that are provided by Ark. The Assisted Safeguarding Monitoring Service continues to provide term/non term time support to our schools.

Senso is a cloud -based solution that will let us monitor and manage all computers and pupils throughout the network from a centralised web portal in real time.

DSLs/Team will receive alerts for safeguarding violations & review and action the critical and urgent alerts within 48 working hours. A top-level overview of all violations across a single or multi-site setup where teachers can monitor and manage their class with live thumbnails.

Exporting evidence when a Senso alert qualifies as a concern in EdAware, under the judgement of the DSL and weekly violation logs/reports provided to DSL & Principal

DSL's will share any information about welfare, safeguarding and child protection with the relevant teachers. They should ensure the teacher knows who these children are. This will help the teacher understand these pupil's academic progress and attainment, maintain a culture of high expectations for them, by teachers knowing it will support them to be able to identify challenges they may face and the academic support and adjustments that may need to be made.

DSLs will ensure that half termly pupil case analysis from Impero EdAware is completed. The Principal/Head of School will be kept informed of any significant safeguarding issues that require escalation, developing patterns/trends or additional needs, by the DSL.

The DSL will ensure that school has more than one available emergency contacts for pupils. School should have at least two emergency contacts for every child in the school in case of emergencies, and in case, there are welfare concerns at the home.

All safeguarding records will be transferred in accordance with data protection legislation to a child's subsequent school/setting, under confidential and separate cover to the new DSL or Principal/Head of School and a receipt of delivery will be obtained.

#### **11. MULTI AGENCY SAFEGUARDING ARRANGEMENTS**

Ark Conway Primary Academy recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance (WTSC 2018). Ark Conway Primary Academy must ensure children's needs are met and to protect them from harm. All staff will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate.

Schools are not the investigating agency when there are child protection concerns and the school will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required and recognise that a crucial part of this may be in supporting the child while these take place.

Ark Conway Primary Academy will follow the new local multi-agency safeguarding arrangements under the LA Safeguarding Partnership system. The DSL will ensure the changes are updated to staff to reflect what's new and staff should understand their roles and responsibilities under the new system.

Ark Conway Primary Academy recognises the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child / Family. The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

#### **12. CONFIDENTIALITY, INFORMATION SHARING AND GDPR**

Ark Conway Primary Academy recognises that all matters relating to child protection are confidential. The Principal/Head of School or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep any information about children, families and colleagues, which have, access to because of their role confidential, they also have a professional responsibility to share information if it is necessary and proportionate with other agencies in order to safeguard children.

These organisations include the three local safeguarding partners:

- The local authority;
- A clinical commissioning group for an area within the local authority; and
- The chief officer of police for an area (any part of which falls) within the local authority area.

Confidentiality is also addressed in this policy with respect to record-keeping in section 10, and allegations of abuse against staff in section 18.

**The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. Everyone in this school who deals with personal data shares the responsibility for data protection.**

**Information sharing** is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Timely information sharing is essential to effective safeguarding.

Ark Conway Primary Academy have clear powers to share, hold and use information for these purposes:

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests. Further advice on responding to disclosures can be found in Appendix A of this policy.

**Regarding confidentiality** if a victim asks the school not to tell anyone **about the sexual violence or sexual harassment** there's no definitive answer. This is because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.

- Staff shouldn't promise confidentiality as it might be in the victim's best interest to seek advice and guidance.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
  - Parents or carers should normally be informed (unless this would put the victim at greater risk)
  - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
  - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

At Ark Conway Primary Academy regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

All staff are directed to the government's [information sharing advice for safeguarding practitioners](#) for further information which includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information as set out below:

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and / or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Ark Conway Primary Academy ensure that policies, training and practice give staff the confidence to know when, how and to whom they can share sensitive information when dealing with a safeguarding concern. The annual safeguarding training also covers how to record that information in a neutral and professional manner, focusing on what is necessary for the safeguarding purpose. If staff are in any doubt about sharing information, they should speak to the DSL or Data Protection Officer/Lead.

**Data protection law** is not a barrier, but it is a system of checks and balances to be borne in mind when recording, sharing, and retaining vital but sensitive data.

- School must appoint a Data Protection Lead to be responsible for guiding the school on data protection matters.
- Senior leaders who manage the 'data ecosystem' should be aware of the content of GDPR in order to oversee how the school is complying with data protection legislation and risks involved
- Training and guidance are available with regards to what information can be shared and withheld when managing any data subject request (for example when an individual exercises an individual's right to access, amend, delete or restrict processing of their peers.
- Staff who influence how data is used, processed and secured should be involved in creating high-level data maps and be aware of lawful reasons for processing data and minimising risks.
- All staff should be aware of what personal data is, how it can be used, and anonymise data. Additional training and guidance are provided to the Data Protection Lead and Senior Leadership Team of the school to support any individual when sharing or withholding personal data. Additionally, the academy's Data Protection Officer can be contacted ([dataprotection@arkonline.org](mailto:dataprotection@arkonline.org)) in the event that any additional guidance or support is required.

When withholding personal data as part of subject access request or freedom of information response, this should be approved by the Data Protection Officer.

### 13. COMPLAINTS

The school has a Complaints Procedure available to parents, pupils and members of staff who wish to report a complaint or concern.

Staff wishing to raise employment issues should consult the staff grievance procedure. It is Ark's intention that all concerns and complaints are dealt with efficiently, sensitively and wherever possible, in confidence.

All reported concerns must be taken seriously and considered within the relevant and appropriate process.

Procedures can be found in the school office and on the school website.

#### 14. STAFF INDUCTION, AWARENESS AND TRAINING

All members of staff will be provided with a copy of part one of the “Keeping Children Safe in Education” (2022) which covers Safeguarding information. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Part One within Keeping Children Safe in Education 2022. Members of staff will sign to confirm that they have read and understood Part One of KCSIE 2022 and this information is kept on the school’s Single Central Record (SCR).

Staff and governors are also required to complete the Ark online KCSIE module to assist further to understand and discharge their role and responsibilities.

The DSL will ensure that all new staff and volunteers including teaching, non-teaching, support, supply, peripatetic, contract staff and third-party contractors (whose employees or sub-contractors have access to school premises), governors, volunteers and trustees working in or on behalf of the school, including those from Ark central team are appropriately inducted as regards the school’s internal safeguarding procedures and communication lines.

A summary information sheet is available to be given to staff and volunteers to support this process.

All staff members will receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:

- **Recognise** potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
- **Respond** appropriately to safeguarding issues and take action in line with this policy
- **Record** concerns in line with the school policies
- **Refer** concerns to the DSL and be able to seek support external to the school if required

All staff members and new governors **must** receive appropriate safeguarding and child protection training (including online safety) which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (including online safety) (for example, via emails, ebulletins and staff meetings), as required, and at least annually, to provide them with the skills and knowledge to safeguard children effectively

#### The key training elements are:

**Induction Training** – this is mandatory and should include;

- the child protection policy;
- the behaviour policy;
- the staff behaviour policy (sometimes called a code of conduct);
- the safeguarding response to children who go missing from education; and
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies). (see KCSIE (2022))

**DSLs** – attend LA training every two years; and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually.

**All other staff – teaching, non-teaching and volunteers** will receive appropriate training to ensure they are aware of a range of safeguarding issues (see definition of safeguarding) and are aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and peer on peer abuse such as bullying and sharing nudes and semi-nudes can put children in danger. The staff training will also include school responsibilities, the school/child protection procedures, online safety, resilience and awareness, safe working practice and external reporting mechanisms.

All members of staff will be made aware of the school’s expectations regarding safe and professional practice via the staff behaviour policy, staff code of conduct and the IT Acceptable Use policy, which is provided and discussed as part of the induction process.

will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

**Safer Recruitment** training is available to all relevant staff and governors who are involved in the recruitment process.

The school recognises the expertise, which members of staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity is therefore, provided for all staff to contribute to and shape safeguarding arrangements and the safeguarding policy via involvement in staff departmental meetings.

The DSL will work with the Safeguarding link governor and the Head of Safeguarding to produce an audit report for the Spring 1 LGB meeting. An end of year report to be presented at the LGB Autumn 1 meeting to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained.

Although the school has a nominated lead for the governing body, all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

## 15. SAFE WORKING PRACTICE

All Ark Conway Primary Academy members of staff are required to work within clear guidelines on Safe Working Practice outlined within our staff behaviour policy (**also called the staff code of conduct**) which also includes information on:

- Low-level concerns
- Allegations against staff, and
- Whistleblowing

Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all staff should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interviews or work with individual children or parents to be conducted in agreed assigned areas.

Staff should be aware of the guidance on reasonable force available in KCSIE 2022 Part 1. Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded on Impero EdAware and signed off by the DSL. Staff should be aware of the school's Behaviour Management Policy; position of trust guidance and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.

Full advice and guidance can be found in Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2019) and Use of Reasonable Force: Advice for head teachers, staff and governing bodies (July 2013) link to both guidance is in Appendix B of this guidance.

Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.). Staff should familiarise themselves with advice and professional expectations outlined in Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings and the network policy [IT Acceptable Use Agreement - January 2021-January 2024.pdf](#)

## 16. STAFF SUPERVISION AND SUPPORT

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

The induction process will include familiarisation with child protection responsibilities and procedures to be followed if staff have any concerns about a child's safety or welfare.

The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- Staff are able to create an environment where members of staff feel able to raise concerns and feel supported in their safeguarding role
- All staff have regular reviews of their own practice to ensure they improve over time.
- The Head of Safeguarding will provide KIT support to those new in role and where additional supervision is required.
- Clinical supervision support is offered to DSLs/DDSs throughout the network

- A named person has been identified to take responsibility for digital resilience and online safety curriculum. This is either the Digital Learning Lead or DSL.
- The DSL Safeguarding IT and Systems Strategy group provide support and best practice approaches to schools on the digital strategy
- A regional DSL Champion is assigned to the school to support to drive activity, best practice and approaches to safeguarding.

## 17. SAFER RECRUITMENT

Ark Conway Primary Academy is committed to ensure that all steps are taken to only recruit staff and volunteers who are safe to work with our pupils and have their welfare and protection as the highest priority.

At Ark Conway Primary Academy the use of the Ark Recruitment & Appointment policy (Appendix D of this policy) is to ensure that Ark Schools employs appropriately skilled staff, assist Ark Schools to deter, identify and reject people who are unsuitable to work with children, help promote equality of opportunity and ensure that Ark Schools meets its statutory obligations.

Safer recruitment is a set of practices and a vital part of creating a safe and positive environment and making a commitment to keep children safe from harm. Ark Conway Primary Academy is responsible for implementing robust safer recruitment practices when recruiting, particularly during the advertising, shortlisting, interviewing and assessment process. Safer recruitment should be a continuing process of improvement for Ark Conway Primary Academy or any club, business or organisation whose work or services involve contact with our pupils.

Ark Conway Primary Academy is responsible for ensuring that safer recruitment processes outlined within guidance, including an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role and appropriate pre-appointment checks.

Ark Conway Primary Academy will also consider alongside Network guidance how to implement online searches for shortlisted candidates.

All staff are asked to disclose any reason that may affect their suitability to work with children at interview.

All new staff and volunteers will undergo an enhanced Disclosure and Barring Scheme check before being allowed to work with pupils or be unsupervised on site. Teaching staff will be required to have registered with the Teacher Regulation Agency. Individuals who have lived or worked outside the UK will be required to undergo further overseas checks in line with guidance in KCSIE 2022.

Further statutory procedures for checking the suitability of staff, volunteers and professionals who work with children see Appendix D of this policy.

Ark Conway Primary Academy is responsible for ensuring that the school maintains an accurate Single Central Record (SCR). The SCR is a list of all staff, volunteers, agency staff, contractors and governors and includes appropriate recruitment and training information such as:

At Ark Conway Primary Academy the Single Central Record (SCR) is used to store important information relating to staff member pre-employment checks. The SCR is centrally stored on schools MIS. These checks are carried out and recorded to ensure anyone working within Ark Conway Primary Academy is not a safeguarding risk to children. For this reason, the SCR is checked during an Ofsted visit. Ark Conway Primary Academy are aware that an incomplete SCR may fail their Ofsted as the school has failed to demonstrate how it keeps children safe.

At Ark Conway Primary Academy an SCR checklist form is completed and signed by schools HR Lead, DSL and Principal **twice every half term** to ensure the SCR is **fully** compliant. It should be completed **within week 2 and week 6** of every half term. All parties **must** be involved in the checking process, and it must **not** be delegated to others.

The SCR for Ark Conway Primary Academy **must** contain the following information for **all** staff. If anything is identified as missing or inaccurate, and as a result a risk this is immediately flagged with schools Regional Director and HR Business Partner.

- enhanced DBS disclosures;

- Barred list check(for staff in working regulated activity only);
- Prohibition Order Check (teaching staff)
- right to work;
- identity;
- Professional qualifications, including Qualified Teacher Status (QTS) and prohibition orders check for teachers (may be required for some support staff posts);
- two references, one being most recent line manager
- signed Childcare Disqualification declaration form, where applicable.
- overseas criminal record (if applicable);
- medical
- Section 128 check (for management positions)
- Safeguarding and Keeping Children Safe in Education Training (once in employment)

A non- employee SCR spreadsheet must be maintained covering as necessary the required information as above for governors, volunteers, ATT Bursary Trainees, supply, contractors such as Sports Coaches and visitors. Information including records of all letters and vetting policies confirming that each agency staff, contractor and others who fit this category has completed the required vetting checks is a requirement of this spreadsheet as they have regular contact with pupils.

Ark Conway Primary Academy follow [Statutory guidance](#) from the Department for Education that under the [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#), some individuals are disqualified from providing childcare or being “directly concerned” in the management of childcare provision if they have committed certain criminal offences.

The disqualification criteria include being on the Disclosure and Barring Service children’s barred list and being found to have committed certain violent and sexual offences against children and adults.

Schools are prohibited from employing a disqualified person in early years provision (for children aged up to and including reception age) both during and outside of school hours, and later years provision (for children under 8) provided outside of school hours only. This also applies to volunteers and 'casual workers', whether supervised or not.

Ark Conway Primary Academy requires staff and others working in settings specified above are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge)(Extended,Entitlement)(Amendment)Regulations2018: <http://www.legislation.gov.uk/uksi/2018/794/contents/made>

Ark Conway Primary Academy **staff** (as appropriate to school setting) **are required to sign the declaration, confirming that they are not disqualified under those Regulations from working** Ark Conway Primary Academy. **Failure to complete the form may result in withdrawal of staff offer of employment.**

The Principal/Head of school/DSL must ensure that a disqualified person is not permitted to continue to work in a setting providing care for children under age 8 unless they apply for and are granted a waiver from OFSTED.

The Principal/Head of School/DSL will apply appropriate judgement regarding the need to supervise and escort visitors and will provide them with appropriate safeguarding information.

It is agreed that all governors will undergo an enhanced Disclosure and Barring Scheme check. Further statutory procedures for checking the suitability of staff, volunteers and professionals who work with children see Appendix D of this policy.

More information on Safer Recruitment can also be found in KCSIE ‘22 Part three, and in relation to the network approach can be found in The Recruitment and Appointment policy. Appendix D of this policy and the school approach in Appendix A of this policy.

#### **18. SAFEGUARDING CONCERNS AND ALLEGATIONS MADE AGAINST STAFF, including SUPPLY TEACHERS, VOLUNTEERS AND VOLUNTEERS**

Ark Conway Primary Academy recognises that it is possible for staff and volunteers to behave in a way that might cause harm to children and takes seriously any allegation received.



We understand that on occasions pupils may make allegations against a member of staff, supply teacher, volunteer or contractor however, staff should also take care not to place themselves in a vulnerable position with a pupil where an allegation can be made. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Principal or Regional Director where there is an allegation against the Principal. If the Principal/Head of school is not present, the most senior teacher present **must** then ensure that the Regional Director, Head of Safeguarding and HR Business Partner are informed as a matter of urgency.

Ark Conway Primary Academy ensure that anything that constitutes an allegation/concern, against a member of staff, volunteer, supply teacher or professional will be dealt with under the specific '**Procedure for Managing Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors**' (procedure available on request; see also Appendix A of this policy for more details). This procedure will be case managed by the Principal. All allegations and concerns must be logged on Impero EdAware by the Principal or Head of School as either meeting threshold (LADO referral) or a low-level concern not meeting threshold.

The guidance in KCSIE (Part Four) should be followed and read in conjunction with Ark **Procedure for Managing Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors**, where it is alleged that any of the above roles working in the school or activity that provides education for children under 18 years of age, has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children or to a particular child;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The Designated Officer (LADO) must be informed of all allegations that come to the school's attention and appear to meet the criteria to discuss the content of the allegation.

Ark Conway Primary Academy also recognises that, at times, malicious allegations may be made against staff. In such cases, it is important to safeguard the member of staff and support their wellbeing, alongside investigating the reasons why the malicious allegation was made and supporting the child and family through the process of investigation and resolution, in line with KCSIE 2022 Part 4. Further information in relation to Ark Conway Primary Academy response to malicious allegations can be found in Appendix A of this policy.

#### **Low-level concerns**

A low-level concern is one which does not meet the threshold as defined above, this does not mean that the concern is insignificant. No matter how small a staff member may perceive their concern if an adult working in or on behalf of the academy has acted in a way which is:

- inconsistent with the academy's behavioural standards as set out in the code of conduct, teachers standards, disciplinary policy and safeguarding and child protection policy, including inappropriate conduct outside of work
- does not meet the threshold or would not be considered serious enough to consider a referral to LADO.

Ark Conway Primary Academy recognises that:

- Low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure
- That this behaviour exists on a wide spectrum from thoughtless, context specific actions or that which is intended to enable abuse. It is crucial that all staff feel enabled to raise such concerns with the designated safeguarding lead or deputy to ensure that such concerns are recorded and dealt with promptly and appropriately
- Schools should follow section 17.3 of **Procedure for Managing Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors** when it comes to sharing a low level concern. The

Principal/Head of school should be the ultimate decision-maker in respect of all low-level concerns, although they may wish to consult the DSL to take a more collaborative approach

- If you're in any doubt as to whether a low-level concern meets the harm threshold, the Principal must consult your local authority designated officer (LADO)
- In the examples of adult sexualised language behaviour that could be a low-level concern, this is deemed as 'humiliating pupils'.

Low-level concerns should be recorded on Impero EdAware by the Academy Principal or Head of School as either meeting threshold or not meeting threshold. This record must include:

- name of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(If the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018 and is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Ark Conway Primary Academy also refer to 'Developing and implementing a low-level concerns policy' (Farrer & Co) <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

Further information in relation to the Ark **Procedure for Managing Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors** can be found in Appendix A of this policy and KCSIE 2022 Part four.

#### **Duty to refer to the Disclosure and Barring Service**

Ark Conway Primary Academy recognises the duty laid out in KCSIE 2022 to refer to the Disclosure and Barring Service (DBS) in incidences where an allegation leads to the removal an individual from regulated activity (or would have removed an individual had they not left), if the school believe the individual has:

- engaged in relevant conduct in relation to children and/or adults,
- satisfied the harm test in relation to children and/or vulnerable adults; or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

Ark Conway Primary Academy will ensure Referrals are be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned.

#### **Duty to consider referral to the Teaching Regulation Agency**

Ark Conway Primary Academy also recognises the duty to consider referring to the Teaching Regulation Agency (TRA) as set out in KCSIE 2022 paras. 350 to 351.

### **19. WHISTLEBLOWING**

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed

- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and the senior leadership team will always take such concerns seriously.

All members of staff are made aware of the school's Whistleblowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child, young person or vulnerable adult at risk.

Decisions never have to be taken in isolation considerations should be given to consult with the [Ark Whistleblowing Policy](#)

The NSPCC runs a whistleblowing helpline on behalf of the government. Members of Staff can also access this helpline if they do not feel able to raise concerns regarding failures internally. Staff can call: **0800 028 0285** (8:00 AM to 8:00 PM Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **20. CHILD ON CHILD ABUSE (*Allegations of abuse made against other children*)**

At Ark Conway Primary Academy all staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online.

At Ark Conway Primary Academy It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should be clear as to the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

At Ark Conway Primary Academy we will support the victims of child-on-child abuse.

All staff should understand, that even if there are no reports in their school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse, they should speak to their designated safeguarding lead (or deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);

- upskirting, 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- abuse in intimate relationships between children is sometimes known as ‘teenage relationship abuse’.

Further information about child-on-child abuse including definitions and indicators is included in KCSIE ‘22 Annex B and in relation to the school’s approach to child-on-child abuse can be found in Appendix A of this policy.

#### **Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos**

- In cases of sharing of nudes and semi-nudes images we follow the advice: Sharing nude and semi-nudes: advice for education settings working with children and young people (Dec 2020)
- This advice uses the term ‘sharing nudes and semi-nudes’ to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.

Further information about **Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos** including definitions and indicators is included in KCSIE ‘22 Annex B and in relation to the school’s approach can be found in Appendix A of this policy and in the school’s Behaviour Management, Anti-bullying, and digital safety/awareness guidance.

#### **Up-skirting**

Ark Conway Primary Academy recognises ‘Up-skirting’ as a criminal offence under changes to the Voyeurism (Offences) Act 2019 which criminalise ‘up-skirting’. This refers to the act of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission.

Further information about up-skirting is included in KCSIE ‘22 Annex B and in relation to the school’s approach to up-skirting can be found in Appendix A of this policy.

### **21. SEXUAL VIOLENCE and SEXUAL HARASSMENT BETWEEN CHILDREN in SCHOOLS**

Ark Conway Primary Academy are aware that the DfE’s standalone guidance on sexual violence and sexual harassment is now absorbed fully within KCSIE ‘22 Part 5 - **child-on-child sexual violence and sexual harassment**.

At Ark Conway Primary Academy all staff are aware that sexual violence and sexual harassment:

- ‘can happen here’
- that there is a zero-tolerance approach to sexual violence and sexual harassment, and that failure to do so can lead to a culture of unacceptable behaviour and in the worst-case scenario, a culture that normalises abuse
- is recognised even if there are no reports, it doesn’t mean it’s not happening
- is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- is not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- is challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- that children with SEND are 3 times more likely to be abused than their peers
- that some groups are potentially more at risk and that evidence shows girls, and LGBT children are at greater risk.

Ark Conway Primary Academy staff are aware of the details on Harmful sexual behaviour (HSB) including:

- HSB can occur online and/or face-to-face and can also occur simultaneously between the 2
- Both the ages and stages of development of the children are critical factors
- The DSL and their deputies should have a good understanding of HSB, which could form part of their safeguarding training
- Children displaying HSB have often experienced their own abuse and trauma, and it's important they're offered appropriate support
  - Preventing abuse notably the DSL should:
    - Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's or college's policies (especially the child protection policy) and responses, and
    - Be confident that they know what local specialist support is available to support all children involved (victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

#### **Discipline and the alleged perpetrator(s)**

Ark Conway Primary Academy DSL should take the lead role including:

- take disciplinary action whilst other investigations are ongoing e.g. by the police
- the fact another body is investigating/has investigated an incident doesn't (in itself) prevent you from coming to your own conclusion about what happened and impose a penalty accordingly.
- to consider it on a case-by-case basis
- The DSL should consider whether:
  - Taking action would prejudice an investigation and/or subsequent prosecution - liaise with the police and/or LA children's social care to determine this
  - There are circumstances that make it unreasonable/irrational for you to reach your own view about what happened
  - can, and should, take disciplinary action and still provide support at the same time if necessary

#### **Working with parents and carers**

Ark Conway Primary Academy the DSL will consider whether:

- (in most cases) engage with both the victim's and alleged perpetrator's parents or carers when there's been a report of sexual violence (this might not be necessary in relation to sexual harassment, but decide it on a case-by-case basis)
- the exception is if there's reason to believe informing a parent or carer will put the child at additional risk
- should think carefully about what information you provide about the other child involved, and when. Make sure you work with relevant agencies to ensure your approach to information sharing is consistent
- consideration is taken of necessary support for siblings following incidents
- It's good practice to:
  - Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress
  - Meet with the alleged perpetrator's parents or carers to discuss what's being put in place that will impact them, e.g. moving them out of classes with the victim. You should explain the reason behind any decision
- the DSL would attend these meetings - decide what other agencies should attend on a case-by-case basis

## Safeguarding other children

Ark Conway Primary Academy DSL will consider whether:

- supporting children (and adult pupils) who have witnessed sexual violence, especially rape and assault by penetration
- do all you can to make sure the victim, alleged perpetrator(s) and any witnesses are not being bullied or harassed
- social media is likely to play a role in the fall out from any incident/alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- school transport as part of your risk assessment as a potentially vulnerable place for a victim or alleged perpetrator(s)
- it's important to keep policies, processes and curriculum constantly under review to protect all children
- reports of sexual violence and/or harassment may:
  - Point to environmental/systematic problems that could be addressed by updating policies, processes and the curriculum
  - Reflect wider issues in the local area

At Ark Conway Primary Academy All staff understand when referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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

At Ark Conway Primary Academy all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Ark Conway Primary Academy protects all pupils and engage social care, support services and the police as required. Whilst the criminal age of responsibility is ten, schools should nonetheless report incidents of peer-on-peer abuse involving children younger than ten to the police where appropriate, who will adopt a welfare rather than a criminal response.

Alongside working with external agencies, Ark Conway Primary Academy follows KSCIE 2022 guidance in putting into place risk assessments for children who may have been, or who are alleged to have been, victims or perpetrators of sexual harassment and sexual violence, in order to ensure that these pupils' physical and emotional wellbeing is protected during and following any investigations into incidents of this nature.

Full advice and guidance can be found in: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (SVSH), May 2018. Further information about Sexual Violence and Sexual Harassment is included in KCSIE '22 Annex B and in relation to the school's approach to Sexual Violence and Sexual Harassment can be found in Appendix A of this policy.

## **22. SERIOUS VIOLENCE**

Ark Conway Primary Academy staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime.

These may include:

- increased absence from school,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing,
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also 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.

Ark Conway Primary Academy should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

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

Advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Further information about serious crime is included in KCSIE '22 Annex B and in relation to the school's approach to serious crime can be found in Appendix A of this policy.

## **23. SAFEGUARDING CHILDREN WITH SPECIAL EDUCATION NEEDS AND DISABILITIES (SEND) or CERTAIN HEALTH CONDITIONS**

Ark Conway Primary Academy acknowledges that children with special educational needs (SEN) and disabilities or certain health conditions can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs, which may make it difficult to tell others what is happening, may be abused more than their abled peers, may find it difficult to express their views, needs and opinions, could be a PA pupil or parent elects to home educate.

Ark Conway Primary Academy will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers.

At Ark Conway Primary Academy we identify pupils who might need more support to be kept safe or to keep themselves safe.

Childnet - STAR SEND Toolkit equips, enables and empowers our staff with the knowledge they need to support young people with special educational needs and disabilities.

Further information in relation to the school's approach to SEND can be found in Appendix A policy.

## **24. LOOKED AFTER CHILDREN (LAC) AND PREVIOUSLY LOOKED AFTER CHILDREN**

At Ark Conway Primary Academy we will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe.

Ark Conway Primary Academy recognise that most children living in care are kept safe from harm. However, a small number remain at risk of abuse or neglect. Children may enter care for all sorts of reasons, but most enter because they have been abused or neglected. These experiences can leave children with complex emotional and mental health needs.

Many children also move repeatedly in and out of care, or between placements. This can prevent them from forming stable relationships with the staff, adults and peers.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously LAC safe.

In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

Ark Conway Primary Academy have appointed a designated teacher, (contact details page 4), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

The Virtual Headteacher has responsibility to promote the education of children who have a social worker and should liaise closely with the Designated Teacher for LAC and DSL on how this is implemented at school level.

Further information in relation to the school's approach to LAC and Previously LAC can be found in Appendix A of this policy.

## **25. CHILDREN WHO ARE LESBIAN, GAY, Bi, or TRANS (LGBT)**

At Ark Conway Primary Academy we recognise that a child or young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether or not) can be just as vulnerable as children who identify as LGBT. Children may also be isolated at home or become homeless after coming out as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. At Ark Conway Primary Academy, we endeavour to reduce the additional barriers faced for our pupils by having a safe space for them to speak to someone or identifying relevant members of staff to speak with.

Further information in relation to the school's approach and arrangements for LGBT pupils can be found in Appendix A of this policy.

## **26. MENTAL HEALTH AWARENESS**

All staff at Ark Conway Primary Academy 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. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Ark Conway Primary Academy can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance. The academy may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

All staff at Ark Conway Primary Academy are 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, exploitation or other potentially traumatic adverse childhood experiences that can leave them vulnerable to further harm.

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Exam or assessment time can also be a time when children experience increased levels of stress and may need extra emotional support; as well as being educationally disadvantaged in facing barriers to attendance, learning and behaviour.

Where staff have a mental health concern about a child that may also be a safeguarding concern, immediate action should be taken in reporting this concern to the designated safeguarding lead or a deputy.

The DSL will ensure at induction and through regular training that staff are aware of the processes for reporting and escalating concerns about mental health. If a member of staff has a concern about the mental health of a pupil, they should speak to the DSL in the first instance.

The DSL may instigate the completion of a mental health 'Strengths and Difficulties Questionnaire (SDQ)' to assess the child's behaviour which is produced by the DfE non-statutory advice for schools in England Mental health and behaviour in schools (DfE, 2018).

The government guidance: Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools and the Rise Above resources underpin our work to safeguard our pupils' mental health.

Further information about Mental Health including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to child on child abuse can be found in Appendix A of this policy.

## 27. ONLINE SAFETY

It is recognised by Ark Conway Primary Academy that the use of technology presents challenges and risks to children and adults both inside and outside of school.

Ark Conway Primary Academy identifies that the issues classified within online safety are considerable, but can be broadly categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes harm
- **Commerce:** unlawful sharing of data, fraud, malware, and other security breaches, including not third-party platforms.

Ark Conway Primary Academy therefore has a responsibility for the following:

### Staff Training

- Ensure that all staff receive regular and updated safeguarding and child protection training (including online safety) at least once a year (at minimum during induction) (\* DfE Guidance).

- Ensure that in addition to induction training, all staff receive regular online safety (for example, via email, e-bulletins, staff meetings) as required to provide them with relevant skills and knowledge to safeguard children effectively (\*DFE Guidance).

**Filtering and Monitoring**

At Ark Conway Primary Academy we manage this risk by:

When children use the school’s network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems – SENSO/SWGfL – a cloud-based solution that will let us monitor, regularly review and manage all computers and pupils throughout the network from a centralised web portal in real time for their effectiveness. However, many pupils are able to access the internet using their own data plan as many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school could sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

To minimise inappropriate use, at Ark Conway Primary Academy pupils sign an acceptable use agreement.

- Ensure appropriate filters and monitoring of devices. Whilst it is essential to ensure that appropriate filters and monitoring systems are in place, Ark Conway Primary Academy will be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught (\*DFE Guidance).
- Ensure robust safeguarding support and follow up is in place to act on any issues raised from the filtering and monitoring process

**Delivery of a well-planned online safety curriculum**

- It is crucial that pupils learn to balance the benefits offered by technology with a critical awareness of their own and other’s online behavior and develop effective strategies for staying safe and making a positive contribution online. Ark Conway Primary Academy will integrate opportunities into the curriculum for every pupil to learn about the following key areas of Digital Awareness and Resilience (as identified in the UKCIS 2020 Framework)
  - a. Self-image and identity
  - b. Online relationships
  - c. Online reputation
  - d. Online bullying
  - e. Managing online information
  - f. Health, well-being and lifestyle
  - g. Privacy and security
  - h. Copyright and ownership
- Staff will reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they’ll be interacting with online)

There are different situations in which pupils access the internet. The table below clarifies the different levels of protection that Ark Conway Primary Academy will ensure is in place.

| Scenario   | Protection  |
|--|---|
| Pupils on a school device in school (including their Chromebook) | When pupils use the school’s network to access the internet, they are protected from inappropriate content by our filtering systems. Ark Conway Primary Academy needs to maintain a Safeguarding Monitoring tool. |

|   |  |
|---|--|
| Pupils on their Chromebook outside of school                          | When pupils use their school-provided Chromebook to access the internet outside of the school's network, they are still protected from inappropriate content by our filtering systems.<br>Ark Conway Primary Academy needs to maintain a Safeguarding Monitoring tool. |
| Pupils on a personal device using the school's internet               | When pupils use the school's wireless system on personal devices their internet traffic is filtered to prevent accessing inappropriate content.  |
| Pupils on personal devices using their own data plan, or public Wi-Fi | Schools can limit the use of personal devices through local policies, there are no technical controls to protect pupils on their own device in this situation.   |

Ark Conway Primary Academy will ensure that the pupils are informed of how to access online learning safely while out of school. Home school agreement.

Further information about Online safety/resilience in relation to the school approach to it including definitions and indicators can be found in Appendix A of this policy and included in KCSIE '22 Annex B.

## 28. MOBILE PHONES AND SMART TECHNOLOGY

We recognise that personal mobile phones and smart technology have the potential to be used inappropriately and therefore Ark Conway Primary Academy has developed a guidance to outline the required protocol for all employees, pupils, supply, volunteers, governors and parents/carers. Staff, volunteers, parents or pupils **must not** use personal phones or devices to take pictures of pupils while in the school environment or on educational visits.

For further information on the use of mobile phones, smart technology, cameras and sharing of images please see Ark IT Acceptable Use Agreement.

## 29. CHILDREN WITH A SOCIAL WORKER

At Ark Conway Primary Academy we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker.

### Virtual school heads

Virtual school heads are based within the LA and have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, Designated teacher for LAC/PLAC, SENCOs, social workers, mental health leads and others.

Further information in relation to the school's approach to support pupils with a social worker can be found in Appendix A of this policy and contact details of the VSH on contact page 4 of this policy.

## 30. CHILDREN MISSING EDUCATION

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

At Ark Conway Primary Academy we monitor attendance carefully and address poor or irregular attendance without delay.

At Ark Conway Primary Academy we follow the Ark **School leavers management and statutory guidance** and ensure our processes keep track of pupils leaving our school for any reason and offer better support management of any at risk cases.

At Ark Conway Primary Academy when pupils leave, we make sure leavers are correctly processed through the MIS and visible on our systems and record the name of the pupil's new school and their expected start date.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2022) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded
  - f. pandemic related non- attendance

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

Further information about CME including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to child-on-child abuse can be found in Appendix A of this policy.

### **31. COUNTER TERRORISM AND SECURITY ACT 2015 (The Prevent Duty)**

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. The DSL will consider the level of risk and decide which agency this concern should be referred. This could include [Channel guidance](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that staff and governors can call to raise concerns about extremism with respect to a pupil. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321

At Ark Conway Primary Academy we use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Further information about the Prevent Duty and to Prevent Radicalisation including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to the Prevent Duty and to Prevent Radicalisation can be found in Appendix A of this policy.

### **32. CHILD SEXUAL EXPLOITATION (CSE)**

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document Child sexual exploitation: Definition and a guide for practitioners (DfE 2017).

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

Further information about CSE including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to CSE can be found in Appendix A of this policy.

### **33. CHILD CRIMINAL EXPLOITATION (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to CCE can be found in Appendix A of this policy.

### **34. COUNTY LINES**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

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 can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Further information about County lines including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to County lines can be found in Appendix A of this policy.

### **35. DOMESTIC ABUSE**

The statutory definition, for Domestic Abuse can be found in the Domestic Abuse Act 2021.

*Definition*

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

At Ark Conway Primary Academy we recognise that:

- children who witness domestic abuse are also victims
- witnessing domestic abuse can have a lasting impact on children
- children can be victims, and perpetrators, in their own relationships too
- the abuse can be physical, sexual, financial, psychological or emotional
- extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships)
- Added to the definition of abuse that harm can include ill treatment that isn't physical, as well as witnessing the ill treatment of others - for example, the impact of all forms of domestic abuse on children (paragraph 26)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

At Ark Conway Primary Academy we are part of Operation Encompass.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Further information about Domestic Abuse including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to Domestic Abuse can be found in Appendix A of this policy.

### **36. HONOUR BASED ABUSE (HBA)**

So-called 'honour-based' abuse (HBA) 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 HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must inform the Designated Safeguarding Lead as a matter of urgency.

Further information about 'honour-based' abuse (HBA) including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to 'honour-based' abuse (HBA) can be found in Appendix A of this policy.

### **37. FEMALE GENITAL MUTILATION (FGM)**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that in the majority of cases, this happens between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

Where there is a disclosure of FGM all staff at Ark Conway Primary Academy know what their statutory response should be and follow 'Keeping Children Safe in Education (2022), paragraph 44, *'whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'*.

This link provides guidance for mandatory reporting <http://safeguarding.link/fgmreporting>.

The mandatory reporting procedures say:

'It is recommended that you make a report orally by calling 101, the single non-emergency number.'

'Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

The procedures also set out what information is needed, in order to make a report.

See here: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting>

Further information about 'FGM including definitions and indicators is included in KCSIE '22 Annex B. In relation to the school's approach to FGM can be found in Appendix A of this policy. teacher should do next to make a report.

### 38. PRIVATE FOSTERING

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents. It does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

All staff are aware that there is a mandatory duty to inform the local authority of children in such arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

Further information about 'private fostering' including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to 'private fostering' can be found in Appendix A of this policy.

### **39. CONTEXTUAL SAFEGUARDING**

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

At Ark Conway Primary Academy we work closely with children's social care practitioners, child protection systems and wider safeguarding partnerships to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

At Ark Conway Primary Academy all staff assess the risks and issues in the wider community when considering the well-being and safety of its pupils.

Further information about 'Contextual safeguarding including definitions and indicators is included in KCSIE '22 Annex B and in relation to the school's approach to Contextual safeguarding can be found in Appendix A of this policy

### **40. CURRICULUM AND STAYING SAFE**

Ark Conway Primary Academy recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

At Ark Conway Primary Academy pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

Ark Conway Primary Academy will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others. This will include online safety.

Ark Conway Primary Academy pupils will be educated at a level appropriate to their age and ability about a range of safeguarding concerns through personal, social, health and economic education (PSHE), tutorials (if appropriate) and through sex and relationship education (RSE). This will include, but is not limited to, bullying (including cyber bullying), radicalisation, child sexual exploitation (CSE), stranger danger, road safety, sexual abuse, neglect, online safety, peer on peer bullying, sexual violence, sexual harassments and Consensual and non-consensual sharing of nudes and semi-nudes images.

Ark Conway Primary Academy PSHE curriculum and Relationship Education, pupils will be taught the knowledge they need to recognise and report abuse, including emotional, physical and sexual abuse. This will be delivered in a sensitive way focusing on boundaries and privacy, ensuring young people understand they have rights over their bodies. This will include understanding boundaries with their peers, friendships and families in all contexts including online. Pupils should know who to report concerns and seek advice when they suspect or know something is wrong.

Ark Conway Primary Academy play a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain and a culture of zero tolerance to sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. This will be underpinned by our:

- behaviour policy
- pastoral support system
- planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent



- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and female genital mutilation (FGM), and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

The delivery of RHSE is monitored by SLT and the subject lead. Pupils' development in RHSE is monitored by teachers as part of internal assessment systems. Pupils will reflect on their own work and their voice will be influential in adapting and amending school curriculum design. Any concerns raised by pupils within discussions or through the delivery of the curriculum must be logged and reported to the DSL.

Ark Conway Primary Academy RSHE/PSHE policy must be made available on school website.

Further information in relation to the school's approach to curriculum, Relationship education, relationships and sex education (RSE) and health education and staying safe can be found in Appendix A of this policy.

#### **41. HEALTH & SAFETY**

In addition to this policy, Ark Conway Primary Academy operate under a centralised Health & Safety Policy which ensures schools create safe working conditions, operate equipment to meet statutory requirements and promotes a safety positive culture.

##### **Policy Objectives**

- To conduct all our activities safely and in compliance with legislation and best practice.
- To provide safe working conditions and equipment.
- To promote a positive safety culture.
- To establish targets and action plans for continuous improvement of health and safety performance.
- To report our health and safety performance both internally and externally

##### **Policy Principles**

- Control - those with management roles are responsible for the clear allocation of health and safety responsibilities and for monitoring that those responsibilities are implemented.
- Co-operation - we all have a responsibility to co-operate as individuals and as groups to make health and safety a collaborative effort.
- Communication - communication of health and safety information is essential and care must be taken to continually review and improve this.
- Competence - developing the health and safety competence of Senior Leadership, managers, employees, and contractors is at the heart of successful health and safety management.

#### **42. THE USE OF SCHOOL PREMISES BY OTHER ORGANISATIONS**

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

When services or activities are provided under the direct supervision or management of Ark Conway Primary Academy staff, their arrangements for child protection will apply.

Where services or activities are provided separately by another body using the school premises, the Principal/Head of School will seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.

Safeguarding requirements should also be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

All external services using school premises will adhere to the school's lettings agreement. If this assurance is not achieved, then an application to use premises will be refused.

School to seek advice from their Regional Facilities Manager contact details on contact page 4 of this policy.

#### **43. SECURITY**

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may become known. Ark Conway Primary Academy operate within a whole-school community ethos and welcome comments from pupils, parents and others about areas that may need improvement as well as what we are doing well.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the school's visitors log system and to display a visitor's badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual (parent or other) that threatens school staff /security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual onto the school site.

Further information in relation to the school's approach to security and summary on Emergency Response Plan can be found in Appendix A of this policy.

#### **44. PROCEDURE IN THE CASE OF A COMPULSORY CLOSURE**

In the case of the school being closed due to a compulsory full or partial closure, the school should follow their Emergency Response Plan and related guidance and risk assessments. At Ark Conway Primary Academy we ensure that our high level of vigilance and surveillance continues at all times during any emergency to safeguard our pupils.

Principals and DSLs are required to read and implement the Ark Conway Primary Academy **Emergency Response Plan** and related guidance and risk assessments attached to safeguarding measures.

In addition, at Ark Conway Primary Academy we will provide a risk assessment relating to the care of vulnerable pupils to ensure that they continue to receive the best possible care.

Further information in relation to the school's approach in case of a compulsory closure or emergency can be found in Appendix A of this policy.

#### **45. ALTERNATIVE PROVISION (AP) /MANAGED MOVES**

At Ark Conway Primary Academy we are responsible for the safeguarding of our pupils when they are placed in an alternative provision or arranging a managed move.

There are different situations in which pupils are placed in an alternative provision, schools can use such provision to try to prevent exclusions, or to re-engage pupils in their education, or to improve behaviour.

At Ark Conway Primary Academy when it is decided to place a pupil at an AP we will ensure:

- non-registered provisions **should not** be used
- carefully considering the provision for vulnerable pupils or pupils where there are any safeguarding concerns at home, pupils with an EHCP, certain health conditions or LAC.
- to carry out a risk assessment on the alternative provisions.
- use of the provision should be time-limited (i.e. review regularly, clear timescales)
- to obtain written confirmation from the AP provider that they have completed all the vetting and barring checks that are necessary on their staff.

- To appoint designated teacher at school to track pupil progress and to make sure the pupil is attending daily, completing work and accessing tutors when necessary.
- It should be really clear at the commissioning meeting, and put in writing, where the day-to-day responsibility is going to lie in locating a missing pupil.
- Outside of the safeguarding remit, schools should also have a sense of how the alternative provider is helping the young person with their personal development.

**Managed move** is a voluntary agreement between schools, parents/carers and a pupil, for that pupil to change school or educational programme under controlled circumstances. A managed move is different to the power of a school to direct a pupil off-site for the improvement of their behaviour.

At Ark Conway Primary Academy when it is agreed to arrange a managed move placement for a pupil we follow our managed move protocol. As schools have to rely on the safeguarding procedures of the new school, at Ark Conway Primary Academy we ensure that the managed move protocol of the new school/borough has a safeguarding paragraph, the policy and training of staff is adequate and these checks are completed before a child moves to the new school.

Under the Education Inspection Framework Sept 2019, school is aware that in their pre-inspection phone call, Ofsted will ask how many alternative providers does the school use, and how many children are placed there. Inspectors may visit AP's and assess their safeguarding procedures, the quality of education and how effectively the provision helps to improve pupil's behaviour, learning, attendance and safeguarding.

Further information in relation to the school's approach to Alternative provision and AP risk assessments and schools managed move protocols can be found in Appendix A of this policy.

#### **46. LOCAL, REGIONAL AND NATIONAL SUPPORT SERVICES**

All members of staff at Ark Conway Primary Academy are made aware of the local, regional and national support available.

Further information in relation to a list of local, regional and national support services can be found in Appendix A of this policy and within KCSIE 2022 - Additional advice, information & support pgs. 140-142 and 150-152.

#### **47. SCHOOL LOCAL PROCEDURES AND PRACTICE GUIDELINES –Appendix A-D**

Schools are required to clearly state and insert in:

**APPENDIX A** of this policy contains the school's approach, flowcharts and checklist for Ark Conway Primary Academy including:

- ✓ Localised school safeguarding procedures, approaches, practice, protocols and guidance documents or links to documents specific to their school
- ✓ School protocols and guidance documents (or links to)
- ✓ LA Safeguarding Partnership arrangements (or links to)
- ✓ Updated from LA and safeguarding partners regarding:
  - ECHP
  - CIN
  - reporting mechanisms,
  - referral mechanisms
- ✓ You should state your LA's Designated safeguarding officer (LADO)
- ✓ Children's social workers/Team Each school may wish to include documentation or links to documentation in addition to the summaries of each area.

**APPENDIX B** contains statutory legislation and guidance and other documents and links to those documents related to safeguarding in schools. Details of other statutory guidance is available within Impero EdAware recording tool.

**APPENDIX C** contains documents or links to those documents highlighted in Keeping Children Safe in Education (Sept 2022) Annex B, as being specific forms of abuse and safeguarding issues.

**APPENDIX D** contains the network Recruitment and Appointment Policy 2021-24 which is relevant to safeguarding as it covers selection and vetting processes.

## APPENDIX A

### Summaries of each area below containing Ark Conway Primary Academy school approach, procedures, practice and guidance documents and /or links to related documents

- **Protection, wider safeguarding and curriculum**
  - Signs and symptoms of Abuse and neglect – procedures/guidance
  - Attendance, Children Missing from Education, Leavers, - school approach
  - Dealing with Disclosures – school approach
  - Child sexual exploitation (CSE): Signs and symptoms - school approach
  - Child criminal exploitation (CCE): Signs and symptoms - school approach
  - County Lines: Signs and symptoms - school approach
  - Children and the court system - school approach
  - Children with family members in prison - school approach
  - Homelessness - school approach
  - Female genital mutilation & mandatory reporting of FGM: Signs and symptoms - school approach
  - Duties under the Counter Terrorism and Security Act 2015 (The 'Prevent Duty): Signs and symptoms - school approach
  - Child on child abuse: Signs and symptoms - school approach
  - Up skirting - school approach
  - Serious violence: Signs and symptoms - school approach
  - Contextual safeguarding: Signs and symptoms - school approach
  - Non-collection of children – school approach
  - Supporting Transgender Pupils ([Ark code of practice](#))
  - Modern Slavery and the National Referral Mechanism – school approach
  - Medicine & First Aid – school approach
  - Health & Safety – school approach /Network guidance
  - Educational visits/Transporting children on school activities – school approach/ Network guidance
  - Intimate care - Network guidance
  - SEND – school approach/Network guidance
  - IT Acceptable Use Agreement - Network policy
  - Whistleblowing – School approach/Network policy
  - Children/young people with Medical Needs – school approach
  - Responding to self-harm, suicide, mental health framework – school approach
  - EYFS -Primary-Secondary transition /post 16 transition – school approach
  - Internet and or Online Safety, digital awareness and resilience – school policy/approach
  - Staff code of conduct – school guidance
- **Behaviour & Attitudes**
  - Behaviour – school policy
  - Anti-Bullying procedure – school policy
  - Searching, screening and confiscation – school approach/behaviour school policy
  - Managing harmful behaviour of children who are vulnerable and/or have committed offences that may present a risk to others in a school setting (Ark Procedure)
  - 'Use of Reasonable force/Physical Intervention /Positive Handling
  - Images/photography of pupils
  - Managing allegations against other pupils
  - PSHE & Citizenship/Relationship & Sex Education (RSHE)/Spiritual, moral, social and cultural (SMSC)
- **Safety**
  - School site security
  - Visitor Management

- First aid and accidents
- Outdoor/educational visits for schools (Ark Code of Practice)
- Summary of school procedure for Coping with a school emergency/Emergency response plan
- Managing Violence Code of Practice (Ark guidance)
- Alternative Provision Risk Assessments (Ark guidance)
- Managed Move protocol
- HR & Governance
  - Safer recruitment and appointment 2021-23
  - Complaint's policy (Ark Policy)
  - Data protection & Information sharing
  - Managing Allegations made against/ Concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors 2021-22 (Ark procedure)
  - Disqualification under the Childcare Act 2006 (DfE 2018)
  - The Governors Handbook – (requirement for Governors)
  - Local, Regional and National support services for staff, parents, pupils

## APPENDIX B

### Statutory legislation and guidance documents links

[Keeping Children Safe in Education \(2022\)](#)

[Working Together to Safeguard Children \(2018\)](#)

[What to do if you are worried a child is being abused \(March 2015\)](#)

[Education Inspection Framework and handbooks \(April 2021\)](#)

[Education and Training \(Welfare of Children\) Act 2021](#)

[Use of reasonable force: advice for head teachers, staff and governing bodies \(July 2013\)](#)

[Information Sharing: Advice for Practitioners \(DfE, 2018\)](#)

[Prevent Duty Guidance for England and Wales' \(2015\)](#)

[Statutory framework for the Early Years Foundation Stage](#)

[The Children Act 1989](#)

[The Children Act 2004](#)

[Domestic Abuse Act 2021](#)

[Education Act 2002](#)

[The Children and Families Act 2014](#)

[SEND code of practice: 0 to 25 years \(DfE 2017\)](#)

[Mental Health & Behaviour in Schools Nov 2018](#)

[Disqualification under the Childcare Act \(DfE, 2006\)](#)

[The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#)

[School attendance August 2020](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance \(July 2017\)](#)

[The Rehabilitation of Offenders Act 1974,](#)

[Safeguarding and Remote Education](#)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people \(Dec 2020\)](#)

[Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 which defines what 'regulated activity' is in relation to children](#)

[Statutory guidance on FGM](#)

[The Human Rights Act 1998,](#)

[The Public Sector Equality Duty \(PSED\)](#)

[The Equality Act 2010](#)

[The Data Protection Act 2018 and General Data Information Protection Regulations](#)

[Serious Crime Act 2015 \(sets out a duty on professionals \(including teachers\) to notify police when they discover that FGM appears to have been carried out on a girl under 18\).](#)

[The Voyeurism \(Offences\) Act, 2019 \(which is commonly known as the Upskirting Act\)](#)

['When to call the police' Guidance for schools and colleges, produced by the National Police Chiefs Council \(NPCC\) 2020.](#)

[Home Office's Preventing youth violence and gang involvement](#)

## APPENDIX C

### **Abuse / Safeguarding Issues that can place children at risk of harm (link to guidance/advice)**

[Abuse](#)

[Bullying including cyberbullying](#)

[Children and the Court System \(Ages 5-11\)](#)

[Children and the Court System \(Ages 12-17\)](#)

[Children with family members in prison](#)

[Child Missing from Education](#)

[Child Missing from home or care](#)

[Child Sexual Exploitation \(CSE\)](#)

[Criminal exploitation of children and vulnerable adult's county lines](#)

[Domestic Abuse](#)

[Drug Advice for Schools](#)

[Fabricated or Induced Illness](#)

[Faith or Belief Based Abuse](#)

[Female Genital Mutilation \(FGM\)](#)

[Forced Marriage](#)

[Gangs and Youth Violence](#)

[Gender based violence/violence against women and girls \(VAWG\)](#)

[Hate](#)

[Homelessness](#)

[Mental health](#)

[Child on child](#)

[Private fostering](#)

[Preventing radicalisation](#)

[Protecting children from radicalisation](#)

[Consensual and non-consensual sharing nudes and semi nudes](#)

[Sexual violence and sexual harassment between children in schools and colleges](#)

[Serious Violence](#)

[Trafficking and modern slavery](#)

[Up-skirting](#)



**APPENDIX D**

**RECRUITMENT & APPOINTMENT POLICY 2021-23**

<https://arkschools.sharepoint.com/ArkNetCentral/policies/Shared%20Documents/Forms/AllItems.aspx?id=%2FArkNetCentral%2Fpolicies%2FShared%20Documents%2FOur%20People>