

**St Louis Catholic Academy, Newmarket**  
**Part of Our Lady of Walsingham Catholic Multi Academy**  
**Trust**

*Christ at the Centre: Children at the Heart*  
*Loving to Learn: Learning to Love*



**Safeguarding Policy**

<b>Date Approved</b>	<b>12-9-2024</b>
<b>Signed</b>	<b>Bethan Byrne</b>
<b>Minuted</b>	<b>25-9-2024</b>
<b>Date of Next Review</b>	<b>September 2025</b>

## Contents

1. Safeguarding Policy Statement	2
2. Important Safeguarding Contacts	2
3. Legislation and Guidance	4
4. Definitions: Safeguarding and Child Protection	6
5. Equality Statement, Children with Protected Characteristics	9
6. Roles and Responsibilities of Staff including Leadership and Management	11
7. Working with Families	17
8. Confidentiality and Sharing Information	19
9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)	21
10. Online Safety and Filtering	33
11. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers and contractors	34
12. Record Keeping	40
13. Safeguarding Training and Development	41
14. Quality Assurance, Improvement and Practice	42

## 1. Safeguarding Policy Statement

A whole-school, child-centred approach is fundamental to all aspects of everyday life at our school. At **St Louis Catholic Academy** we strive to create a culture which enables children to express their wishes and feelings and talk about anything that is of importance to them. We believe that every child deserves to receive an education within an environment where they feel safe to learn and develop. We want our pupils, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is fundamental to create and maintain a child-centred approach to safeguarding.

In practice this means we endorse the key principle that the welfare of a child is paramount, keeping them at the centre of all decision making in our partnership working with them, their families, and those supporting them.

In line with our duties set out in the Children Act (1989, 2004) and Working Together (2023) we are committed to providing support and help as soon as possible, underpinned by our values that children are best looked after within their families, with their parents playing a full part in their lives where possible. We are also committed to ensuring that we work with agencies, including the Local Authority, to access support and targeted interventions for families when we consider that a child is, or may be, at risk of harm.

We hope that parents and carers will support us to undertake our statutory duties to offer early help support and to liaise with agencies to protect children who have suffered or otherwise likely to suffer significant harm without doing so. The core objective of early help support is to prevent any child from being harmed or placed at risk of harm and therefore halt any escalation where possible.

This policy outlines the commitment to our legal duties to safeguard children, the responsibilities for all our staff and the specific roles and responsibilities for our key Designated Safeguarding Leads and Governance.

## 2. Important Safeguarding Contacts

Safeguarding Team Contacts
Role: Name and contact details:
Designated Safeguarding Lead (DSL) Sue Blakeley
Deputy DSL Chris White, Tee Smith
Alternate DSLs: Tee Smith, Kerri Conway and Kiri Wyatt
Named Safeguarding & Attendance Governor: Emily Burbridge
Co-Chairs of Governors: Bethan Byrne & Marc Walker
Vice Chair of Governors: Jenny Balmer
School online safety Lead: Sue Blakeley
Designated teacher for Children in Care and children previously in care (CiC): Chris White

Senior Mental Health Lead: Kerri Conway
Prevent Leads: Sue Blakeley and Chris White

### Non School Contacts

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Duty LADO	Email on <a href="mailto:LADO@suffolk.gov.uk">LADO@suffolk.gov.uk</a> or LADO central telephone number 0300 123 2044
Suffolk Safeguarding	Customer Service Centre	If you are concerned about a child or an adult and unable to use the Portal below, you can call Customer First on 0808 800 4005 (this is a freephone number).
Families First	Suffolk Safeguarding Partnership	<a href="http://suffolksp.org.uk">Suffolk Safeguarding Partnership (suffolksp.org.uk)</a>
Prevent	Prevent referrals  Parent guidance  Advice line for members of the public  Channel helpline	Prevent Referrals – <a href="http://suffolksp.org.uk">Prevent — Suffolk Safeguarding Partnership (suffolksp.org.uk)</a>  <a href="#">Prevent National Referral Form 2024</a>  <a href="http://educateagainsthate.com">Parents' Booklet (educateagainsthate.com)</a>  <a href="#">ACT Early   Prevent radicalisation</a> 0800 011 3764  You can also report suspicious activity by contacting the Police in confidence on <b>0800 789 321</b>  020 7340 7264
NSPCC Helpline	N/A	Call: <a href="tel:08088005000">0808 800 5000</a> Email <a href="mailto:help@NSPCC.org.uk">help@NSPCC.org.uk</a> .
Police	N/A	Emergency 999, Non-emergency 101

### 3. Legislation and Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance.

[Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/keeping-children-safe-in-education) (KCSIE) which sets out the legal duties that all schools and colleges in England must follow to safeguard and promote the welfare of children under the age of 18.

Section 175 of the [Education Act 2002](https://www.gov.uk/guidance/education-act-2002), places a duty on schools and Local Authorities to safeguard and promote the welfare of pupils.

[The School Staffing \(England\) Regulations 2009](https://www.gov.uk/guidance/the-school-staffing-England-regulations-2009), which sets out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.

[Maintained schools governance guide - 7. Compliance - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/maintained-schools-governance-guide-7-compliance-guidance) (2024) provides guidance for governing bodies on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, school admissions, school attendance, schools causing concern, school complaints, length of school day and year, opening, closing or making organisation changes to a school, managing school premises, control and community use of school premises, school uniform, staffing and performance management, and whistleblowing.

This guidance is a reference document for those involved in local-authority-maintained school governance. It brings together essential information from a range of sources on the governing body's roles and legal responsibilities.

This policy also meets requirements relating to safeguarding and welfare in the [Statutory framework for the early years foundation stage for group and school providers \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/early-years-foundation-stage-for-group-and-school-providers)

The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](https://www.gov.uk/guidance/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](https://www.gov.uk/guidance/childcare-act-2006), which set out who is disqualified from working with children.

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](https://www.gov.uk/guidance/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.

[Academy trust governance guide - 7. Compliance - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/academy-trust-governance-guide-7-compliance-guidance) provides guidance for boards on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including admissions, attendance, complaints, education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, schools causing concern, school day and school year, management of academy premises, control and community use of academy premises, school uniform, staffing, and whistleblowing.

This guidance is a reference document for those involved in trust governance. It provides essential information from a range of sources on the trust board's roles and legal responsibilities. The Academy Trust Handbook (ATH) and our funding agreement have more information on contractual requirements.

[Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

[Working together to safeguard children - GOV.UK \(www.gov.uk\)](#) DfE guidance outlines what organisations and agencies must and should do to help, protect and promote the welfare of all children and young people under the age of 18 i

[Suffolk Safeguarding Partnership \(suffolksp.org.uk\)](#) The three partners (Suffolk County Council, Police and Health) have a joint and equal duty to ensure multi-agency safeguarding arrangements are in place at a local level, and organisations and agencies are clear about how they will work together to safeguard children and promote their welfare of children. Every person has a right to be safe and the Suffolk Safeguarding Partnership work with lots of different organisations including care homes, fire, health, housing associations, police and probation, schools, social workers and the voluntary sector, to make sure that they are all working together and doing what they can to keep children and young people and adults at risk safe from any type of harm or neglect.

[Serious Crime Act 2015](#), Female Genital Mutilation Act 2003 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, Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#). All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism"

[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 regarding 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 is 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

Escalation of Concerns and Professional Disagreements about Decisions, including Convening an ICPC [4.5.3 Escalation of Concerns and Professional Disagreements about Decisions, including Convening an ICPC \(proceduresonline.com\)](#)

[Information sharing advice for safeguarding practitioners](#) produced by the DfE, outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes. It also includes the “Seven Golden Rules for Sharing Information”, which provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm. It is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

#### 4. Definitions: Safeguarding and Child Protection

All our staff at **St Louis Catholic Academy** are expected to be familiar with the wide range of policies and procedures we have to keep our children safe and promote their wellbeing at all times.

**Safeguarding** as defined in Keeping Children Safe in Education (2024), means:

- *providing help and support to meet the needs of children as soon as problems emerge*
- *protecting children from maltreatment, whether that is within or outside the home, including online*
- *preventing impairment of children’s mental and physical health or development*
- *ensuring that children grow up in circumstances consistent with the provision of safe and effective care*
- *taking action to enable all children to have the best outcomes.*

Working Together to Safeguard Children (2023) further extends this definition to include:

- *promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children*
- *taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework.*

**Child/ren:** The legal definition of a child in the UK includes everyone under the age of 18.

‘**Early Help**’ is a term used in Suffolk that refers to a wide range of interventions offered by various organisations and partner agencies, as well as services within the County Council and beyond. The primary early help service in Suffolk is detailed [Early Help — Suffolk Safeguarding Partnership \(suffolksp.org.uk\)](#).

**Families First Assessments (FFA)** are used by practitioners who work with children, young people, parents, and carers where it is considered that the child/family would benefit from early help support. It is used to identify needs, and to organise the right support and services to address those needs at an early stage. The FFA process allows different agencies and services to share information and work together in a coordinated way.

For families with children under 18 (25 if they have a learning need or disability), Families First can help with issues such as parenting, mental and physical health problems, drug or alcohol dependency, domestic abuse, school-related concerns, debt problems, and risk of becoming homeless.

The [thresholds guidance](#) (published on Suffolk Safeguarding Partnership website) has been compiled by Suffolk Safeguarding Partnership and partners. It meets the requirements of the government's "Working Together to Safeguard Children 2015".

The example indicators in the [thresholds matrix](#) (published on Suffolk Safeguarding Partnership website) should not be taken literally. Practitioners take account of support and resources available, local policies and Suffolk County Council priorities.

**Child in Need:** Under the Children Act 1989, local authorities are under a general duty to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child in need is defined under section 17 of 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. To fulfil this duty, practitioners undertake assessments of the needs of individual children, giving due regard to a child's age and understanding when determining what, if any, services to provide.

**Child Protection:** Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child who lives or is found in their area is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. Such enquiries, supported by other organisations and agencies, as appropriate, should be initiated where there are concerns about all forms of abuse, neglect, and exploitation whether this is taking place in person or online, inside or outside of the child's home. There may be a need for immediate protection whilst an assessment or enquiries are carried out. Schools are required to cooperate with children's social care when carrying their inquiries and therefore we have a duty to share information when requested to do so.

**Significant Harm** is the threshold for a child protection response to support and or protect children. Harm is defined in the Children Act 1989 as the ill-treatment of a child or the impairment of their health or development. This can include harm caused by seeing someone else being mistreated, for example by witnessing domestic abuse. The phrase 'significant harm' was introduced by the Children Act 1989. The Act does not define 'significant'. The question of whether or not harm is 'significant' relates to its impact on a child's health or development.

The 'front door' to Suffolk's social care [Reporting a child at risk of harm, abuse or neglect \(safeguarding\) - Suffolk County Council](#) is the way that Suffolk County Council and the Suffolk Safeguarding Partnership receives contacts and referrals (queries via calls or emails) from partner agencies and members of the public for support from Early Help and Children's Social Care. Contacts are received via the Customer Service Centre, where there are current safeguarding concerns that require an immediate response. It provides a single response to all new contacts that require an initial multi-agency approach. Contacts that present as meeting a threshold for immediate response are transferred directly to the Multi Agency Safeguarding Hub (MASH) team. The Suffolk MASH makes decisions about next steps when a concern is raised about a child who is reported to be at risk of harm, abuse and neglect.

The multi-agency MASH team operates to the principle that every family (child/young person and their parent/carer) has the right:



- to be told when a professional is worried about the safety or wellbeing of their child *by that professional*
- to have their consent obtained when someone wishes to make a request for support on their behalf
- to be front and centre of the plan to keep their child safe and well.

**Multi Agency Safeguarding Hub (MASH)** is a partnership of Children’s Services, that comprise Health, Police, and Probation. Advisory support is provided by Independent Domestic Violence Advocates and satellite partners, these agencies work together to identify the need of children and their families and signpost to the appropriate agency or resources where threshold is met.

The main aim of a MASH is to improve the quality of information sharing when making decisions between agencies at the earliest opportunity.

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

**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. Section 9 provides the full definition.

**Exploitation** is a risk to children and young people that takes place outside of their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

NB the terms abuse, neglect, and exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

**Children Looked After:** A child is ‘looked after’ (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a Local Authority approved foster carer.

**Kinship Care** refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a [Kinship Care Strategy](#) to improve kinship carers’ financial stability, education, training, and partnership with local authorities and other agencies.

These arrangements can be known as either family and friends care or private fostering.

- **Family and Friends Carers:** If you’re a grandparent, aunt, uncle, brother, sister, or family friend looking after a child who can’t be cared for by their birth parents, you’re known as a family and friends carer. Sometimes these carers will be given Parental Responsibility for the children through a Child Arrangements or Special Guardianship Order.

- **Private Fostering:** You're a private foster carer if you're not a close relative and you're looking after a child who's under 16 (or under 18 if they're disabled) for more than 28 days in a row.

**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 and their parents and carers) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

## 5. Equality Statement, Children with Protected Characteristics

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. At **St Louis Catholic Academy** we are committed to anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers or protected characteristics they may have. As stated in the Equality Act 2010, we recognise the protected characteristics that may be applicable to our pupils:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

All staff and volunteers understand the importance of recognising that a child may benefit from Early Help intervention, and it is integral to our whole school approach to look and listen out particularly for children:

- who have a special educational need and/or disabilities (SEND) or health conditions
- who are a young carer
- who could experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after (see Section 11)
- who have ongoing unexplainable and/or persistent absences from education

- whose parent/carer has expressed an intention to remove them from school to be provided with elective home education (EHE).

### **Children with Special Educational Needs and Disabilities (SEND)**

We know who our pupils are with special educational needs, disabilities, or additional health needs and recognise that they may face additional barriers, that can include:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's impairment without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- assumptions that children with SEND can be disproportionately impacted by things like bullying - without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- a disabled child's understanding of abuse
- lack of choice/participation.

### **Children Looked After (CLA)**

The most common reason for a child to become looked after is as a result of abuse and/or neglect. We therefore ensure that the appropriate arrangements are in place to support these children and keep them safe from further harm. This includes:

- appointment of a Designated Teacher (DT) for CLA
- appropriate staff made aware of a child's looked after status
- ensure that necessary staff have the skills, knowledge and understanding of the child's needs
- ensure the child's record contains a clear understanding of their legal status and care arrangements, including the levels of authority delegated to their carer and contact arrangements with birth parents or those with parental responsibility
- keep contact details of the child's social worker, carer(s) and name and contact details of the virtual school head for DT to liaise with.

### **Children with a Social Worker (CWASW)**

Virtual School Heads have a responsibility for the strategic oversight of the educational attendance, attainment, and progress of:

- **children looked-after,**
- **children previously looked-after;** and
- **children with a social worker** – defined as any child who has been assessed as being in need under section 17 of the Children Act 1989 and currently has a social worker; it also includes those who have been assessed as needing, or previously needing, a social worker within the past 6 years due to safeguarding or welfare reasons.

In line with [Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK \(www.gov.uk\)](#) this has been extended to include:

- **children who have previously had a social worker** – the cohort of children with a social worker and those who have previously had a social worker who are aged from 0 to 18; and
- **children in kinship care arrangements** - this means any friend or family member, who is not a child's parent but raising them for a significant amount of the time, either as a temporary or permanent arrangement.

In offering advice and information to workforces that have relationships with children with social workers, virtual school heads identify and engage with all key professionals in Suffolk and beyond, helping them to understand the role they have in improving outcomes for CWASW e.g. DSL and deputies, social workers, headteachers, governors, special educational needs co-ordinators, mental health leads, other Local Authority partners, including Designated Social Care Officers for SEND.

**St Louis Catholic Academy** ensures that our Designated Teacher has the appropriate training, so they are able to take the leadership of this crucial area of our safeguarding arrangements in collaboration with our Designated Safeguarding Lead which includes:

- working closely with virtual school heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- collaborating with the virtual school heads to also promote the educational achievement of previously looked after children.

## 6. Roles and Responsibilities of Staff including Leadership and Management

### Role and Responsibilities of the Whole School

Safeguarding is **everyone's** responsibility at **St Louis Catholic Academy**. This policy applies to all of our staff including permanent, temporary and supply, volunteers, governors and contractors. It also applies to our safeguarding arrangements for extended school and off-site activities.

**St Louis Catholic Academy** plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia 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. **St Louis Catholic Academy uses TenTen Life to the Full programme to provide this curriculum for EYFS to Year 6 students and includes:**
  - 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)

### **Role and Responsibility of all staff (permanent, temporary and supply), volunteers and contractors**

#### **All staff will be required to:**

- read Part One and Annex B of [Keeping Children Safe in Education](#), and the reviewed version of this guidance at least annually. Staff/volunteers who do not work directly with children are not required to read Part One and can be provided with Annex A (a condensed version of Part One) but to promote good practice we recommend that they do so.

Translated versions of Part One Keeping Children Safe in Education can be found at [Keeping Children Safe in Education Part 1 Translations | LGFL for staff, volunteers, parents and carers](#) whose first language may not be English, should they wish to use this

- read Annex B of Keeping Children Safe in Education which outlines important additional information about specific forms of abuse and safeguarding issues to ensure we have a culture that recognises that children within the specific circumstances can be at greater risk of abuse, neglect and exploitation, and a working knowledge to identify indicators. As good practice, we ask staff who do not directly work with children to also read this chapter
- sign confirmation that they have read the expected sections according to their role, have understood the content and their roles and responsibilities in our whole school approach to safeguarding
- promote and raise awareness about the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- contribute to creating a culture for any child defined as having a protected characteristic to speak out and share their concerns (see Section 5).

#### **All staff will be aware of:**

- our school's safeguarding arrangements and systems which is explained to staff as part of their induction and annual update training. As part of staff induction new staff/volunteers are provided with the following key guidance and information provided by our school senior leadership team:
  - Child Protection Policy
  - Staff Behaviour Policy/Code of Conduct
  - the role and identity of the Designated Safeguarding Lead (DSL) and deputies

- the Behaviour Policy
- online safety policy
- our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- signs of vulnerabilities to look out for in children who may benefit from Early Help support, we explain to staff the Early Help process for children and their families and what their role is in this to support DSLs in ensuring children and their families receive support as soon as problems emerge
- the importance of Early Help Assessments [Early Help Assessment \(EHA\) - Suffolk County Council](#) and how they can help identify emerging difficulties and therefore how sharing information, including with other practitioners, can support early identification and assessment
- 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
- the process for recording and sharing information internally to DSLs and on children's safeguarding records
- the process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow
- the signs of 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) [See Annex B Keeping Children Safe in Education](#)
- how to support and speak to children when they may share their worries or make disclosures of abuse, neglect or exploitation and contribute to creating a culture where children feel able to speak with the relevant safeguarding leads
- the importance of reassuring children that they are being taken seriously and that they will be supported and kept safe
- the importance of supporting families and providing a culture of support to encourage parents/carers to seek support and engage with our school and professionals when issues emerge or become a concern
- children can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online
- the fact that children who are (or who are perceived to be) lesbian, gay, bisexual (LGBTQ+) can be targeted by other children
- what to look for to identify children who need help or protection in accordance with statutory provisions under the children act section 17 (child in need) and section 47 (significant harm).

## **Role and Responsibilities of the Designated Safeguarding Lead (DSL)**

Our DSL team includes a member/s of our senior leadership team. We also have a Deputy DSL and Alternate (ADSLs) within our staffing group. Whilst one of the DSLs is referred to the 'lead' and will coordinate the DSL team, they are all trained at the same level to ensure that at all times one or more of them are available to carry out all of their designated functions in safeguarding.

- The DSL takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- Whilst all of our staff are part of our safeguarding culture, it is the role of our DSL to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise.
- The DSL will act as the main contact in our school when a child and their family are receiving support from the school, external agencies and statutory services.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. *DSLs can work outside of these hours when matters of support or a child protection matter arises.*
- In the event that non-urgent matters arise out of school hours, our DSL can be contacted, if necessary using their contact details shared with all staff.
- When the DSL is absent, please contact school's Deputy DSL(s)

**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 and/or lead early help support which may include a Families First Assessment and thereafter attend/chair Team Around the Child meetings
- take part in strategy discussions organised by the Local Authority's Children's Social Care and inter-agency meetings and/or support other staff to do so when required
- contribute to the assessment of children (when a child may have suffered harm or is at risk of harm)
- 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 behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children
- have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer or associated adults where necessary
- have a good understanding of the filtering and monitoring systems and processes in place at our school
- assist the Headteacher to review and respond to low-level concerns that may arise regarding staff
- share information and/or take part in statutory processes that involve reviewing and analysing of safeguarding practice and policies. This can include meetings held by Suffolk Safeguarding Children's Partnership in response to significant safeguarding incidences, child death and/or where a safeguarding practice review is required to determine learning and practice analysis.

**The DSL will also:**

- liaise with universal, targeted and statutory agencies, Local Authority workers (Children's Services and other key practitioners) when there are safeguarding concerns as appropriate (includes early help and child protection)
- share information about incidences of sexual violence and sexual harassment with statutory colleagues such as Police and Children's Social Care colleagues in order to prepare and implement the school's policies
- be confident about what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment
- be aware that children are entitled to have an 'Appropriate Adult' to support and help them in Police investigations or if there is threshold met for them to be searched.

The full responsibilities of the DSL and deputy(s) are set out in their job description, see [Annex C KCSiE](#)

## **Role and Responsibilities of the Governance**

Our **St Louis Local Governing Body** has a strategic role within our leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

### **The Governing Body will:**

- facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development for the setting
- evaluate and approve this child protection policy along with other policies related to safeguarding at each review, ensuring they comply with the law, and hold the Headteacher to account for their implementation
- evaluate and approve recommendations/action plans identified through quality assurance activity that the Headteacher/DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the Headteacher accountable for the practice improvement
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- appoint a lead Safeguarding and Attendance governor to monitor the effectiveness of the school's safeguarding arrangements including policies and their implementation, in conjunction with the full governing body. This is always a different person from the DSL.
- ensure all staff undergo safeguarding and child protection training, including online safety according to their roles, and that such training is regularly updated and is in line with statutory guidance and Suffolk Safeguarding Children's Partnership
- ensure that all governors:
  - read Keeping Children Safe in Education in its entirety, and review compliance of this task at least annually
  - sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance (bottom of this policy).
  - ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:



- making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
- reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

### **The Governing Body will make sure:**

- the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- the DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- the school has effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to child welfare concerns, low level concerns and allegations made against staff
- that this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- where another body is providing services or activities on the school site (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed
  - make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
- make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- the Co-Chairs of Governors together with the Trust CEO will act as the 'case manager' in the event that an allegation is made against the Headteacher. where appropriate (see Section 11 Managing Concerns and Allegations)
- Section 14 (Training) of this policy has information on how governors are supported to fulfil their role, also see Part two KCSiE 2024.

### **Role and Responsibilities of the Headteacher**

The Headteacher will:

- implement this policy and ensure that all staff:
  - are informed of our school's systems which support safeguarding, including reading and understanding this policy, as part of their induction
  - follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect

- make this policy available to parents/carers, professionals and the community to ensure there is transparency and clear expectations about the school's duty to safeguarding and promote the welfare of children and the arrangements for responding to children presenting with needs that may require early help or support to protect them
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- act as the 'case manager' representing the school in the event of an allegation of abuse made against another member of staff or volunteer
- managing cases where there are low-level concerns regarding the conduct of staff, or oversee delegation to the DSL
- ensuring the relevant staffing ratios are met, where applicable

### **Role and Responsibilities of the Designated Teacher**

Our Designated Teacher takes leadership of promoting the educational attainment of Children with a Social Worker which includes:

- working closely with Virtual School Heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- to carry out their duties in line with [Designated teacher for looked-after and previously looked-after children - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and extended duties as outlined [Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- working closely with our DSL for those children who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these children is appropriately entwined with safeguarding processes.

## **7. Working with Families**

Alongside Keeping Children Safe in Education **St Louis Catholic Academy** adopts the fundamental principal of ***working in a child-centred approach within a whole family focus*** as promoted in Working Together to Safeguard Children 2023.

This principle is underpinned by the findings and recommendations within the Government's 2023 publication [Stable Homes, Built on Love](#) in response to the recommendations of the Independent Review of Children's Social Care. The strategy sets out how children's social care is to be committed to supporting every child to grow up in a safe, stable and loving home. For most children this means growing up within their family. The strategy also emphasises the importance of having stronger expectations of support through early help and family networks.

At **St Louis Catholic Academy** our principles align to the above. We endeavour to work in partnership and collaboration with children and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

Our principles include, but are not limited to:

**Promoting effective partnership working with parents and carers** e.g. build strong, positive, trusting, and co-operative relationships by:

- approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
- avoiding reinforcing family shame, suffering, and blame
- making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family
- using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change
- ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parent's engagement and use their expertise to adapt their response with care and compassion
- adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled children, and where harm is outside the home
- ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
- being alert and recognising where parents or carers may not be acting in the best interest of the child or where children may be experiencing abuse, neglect, and exploitation as a result of actions by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement
- being mindful of negative stereotypes when making decisions which might lead to false assumptions.

**Communicating effectively verbally and non-verbally by:**

- communicating with respect, being clear, curious and inclusive; adapting to parent's and carer's needs
- providing materials to children, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easily understood
- ensuring any materials, such as minutes or reports, capture the school's contribution but also those from the children, parents and carers which must include their views and wishes
- supporting families to access support to translate information where English is not their first language. Our school will access interpreters where needed including British Sign Language.

**Empowering our parents and carers** to participate in decision-making to help, support and protect children by:

- creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements
- ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing
- asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support

- promote families' rights to support through use of advocates, family members or a supporter
- ensuring parents and carers are fully aware of who will attend meetings and discussions, if the child will be invited to participate, and the format of the meeting or discussion
- giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements
- signposting parents and carers to sources of help and support available locally or through the Local Authority
- provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to readapt a family's plans
- being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children
- helping parents and carers to understand what the issues are and how these impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes
- providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them.

## 8. Confidentiality and Sharing Information

Trusted relationships are at the heart of working with children and their families at **St Louis Catholic Academy**. We strive to uphold good practice and work in partnership with children and families, communicating effectively and listening well so that we have sufficient information to understand and be able to meet their needs.

An open culture is imperative when deciding whether to share information and it is important to get the lawful basis right. The legal framework can appear complex, and a lack of clarity can lead practitioners to assume, incorrectly, that no information can be shared because consent has not been provided. Our school understands the lawful basis in which our DSLs can share information with other people, agencies and organisations about the children and families we are supporting.

In line with our principles of working with families outlined above, we strive to be transparent, open and clear when we need to discuss any information or concerns that worry us about a child's wellbeing. If we feel that we need to share information, we will explain how information will be shared or used so that families can make an informed choice about whether to consent.

If we feel that we need to share information with services due to concerns about a child's safety or welfare to provide the family with specific support, we will be upfront, transparent and honest about our concerns and the ways in which such services could help the family. We will endeavour to support and encourage the family to consent and engage with such support. We believe that this collaborative approach will support children to have the confidence to speak up and share their views as well as encouraging parents and carers of children at our school to have a willingness to engage with services that provide support.

If we have a concern about a child's safety and have decided to share information to protect them from a risk of harm, we will endeavour to gain cooperation and understanding from parents and carers. We will strive where possible to always gain consent and where we believe our concerns have increased and warrant the sharing of information to statutory services such as Police and Children's Social Care, we will have made efforts to discuss, explore and provide support to

address these with families in a collaborative way beforehand; concerns should not be a surprise to families unless in situations where a one off or unprecedented incident occurs.

However, for a small number of children, seeking parental consent is not always possible and may place a child or others at risk of harm, for example:

- the child would be placed at increased risk of significant harm through the action of gaining this consent
- there would be an impact on a criminal investigation
- a delay in making the referral would impact on the immediate safety of the child.

In situations where our professional or legal duty is exercised to share certain information in the absence of consent, we will inform them as soon as possible if it is safe and appropriate to do so. We will be clear about what we have shared, with whom, the reasons why and how the information will be used.

In any situation where a child or their parent/carer object to consent or particular information sharing and we decide that it is proportionate to do so, a clear rationale, outlining our decisions and the reasons why, will be recorded on the child's file.

In situations where there are allegations of child-on-child abuse, we will notify the parents or carers of all the children involved. If a child or group of children have suffered significant harm or are considered at risk of harm either directly or online we will have a duty to consider making a referral to Children's Social Care and the Police if a crime has been committed. The process for this can be found in Section 9 and our principles for information sharing and consent will apply, unless we have a legal obligation to report the incident.

In addition to sharing information, our DSLs will endeavour to arrange a meeting with the parents and carers of all children to share information about the incident, plan safety strategies and/or risk management plans. Our DSLs will endeavour to keep families up to date and provide reassurance on any measures being taken, whilst respecting the privacy of each individual child involved.

The [Data Protection Act \(DPA\) 2018](#) does not prevent or limit the sharing of information for the purposes of keeping children safe. **St Louis Catholic Academy** recognises that timely information sharing is essential for effective safeguarding. Whilst we promote collaboration and partnership with our families, 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 when required.

The following principles apply to **St Louis Catholic Academy** confidentiality agreement:

- timely information sharing is essential to effective safeguarding.
- the Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe
- if staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a 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
- if a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- even if a victim doesn't consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies
- the DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- the DSL should consider the following points:
  - parents or carers should normally be informed (unless this would put the child 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 Children's Social Care where the child resides
  - 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.
- 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
  - have regard for the Government's publication [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/information-sharing-advice-for-safeguarding-practitioners) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information with all relevant parties.

If staff are in any doubt about sharing information, they can seek advice from our Headteacher, DSL or any person in a position of senior leadership or wider DSL team.

## **9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)**

### **Abuse, neglect and exploitation**

All our staff are aware of what abuse, neglect and exploitation is and have an understanding of the different types of indicators which could suggest a child is suffering or likely to suffer harm.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect and exploitation so that we are able to identify children who may be in need of help or protection at the earliest opportunity.

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Our staff are aware that children may be abused by an adult or adults or by another child or children.

### **Physical Abuse**

Physical abuse is a form of abuse which may involve:

- hitting
- shaking
- throwing
- poisoning
- burning or scalding
- drowning
- suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (Fabricated Induced Illness FII).

### **Emotional Abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction
- a child seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing a child to feel frightened or in danger
- exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

### **Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- **Physical contact:** including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- **Non-contact activities:** such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- **Online abuse:** sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children.

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

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

### **Exploitation**

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.
- **Child Labor Exploitation:** this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.
- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.
- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.



## Safeguarding Issues and Specific Forms of Abuse

All our staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, school and any place/space that children occupy or access such as:

- Child abduction
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Children and the Court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalization
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence
- FGM and the mandatory reporting duty for teachers
- Forced marriage.

### Child-on-Child Abuse

At **St Louis Catholic Academy** we know that children can cause harm to other children. As a school we have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it could happen here". Our staff are aware that even if no reports are being made in our school, it does not mean it is not happening.

Our staff understand that it is important to challenge inappropriate behaviours between children that are abusive in nature, and we have clear expectations that incidents are not downplayed or suggested to be jovial or part of growing up as this can lead to a culture of unacceptable behaviours and unsafe environments for children and young people.

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 children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

- consensual and non-consensual sharing of nude and semi-nude 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).

### **Domestic Abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Our staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Our staff are aware that domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that 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.

### **Female Genital Mutilation (FGM)**

Keeping Children Safe in Education (2024) explains that FGM includes '*all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.*'

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting', 'circumcision' or 'initiation'.

**Our teachers** are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are

- informed by a girl under 18 that an act of FGM has been carried out on her
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth).

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, teachers know they must report to the DSL who will follow local safeguarding procedures.

Our members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.

### **Prevent and concerns about extremism**

**St Louis Catholic Academy** is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have “*due regard to the need to prevent people from becoming terrorists or supporting terrorism*”. This duty is known as the Prevent duty.

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education.

Our staff are aware that children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our school's safeguarding approach.

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to [Preventing Radicalisation - Suffolk County Council](#) or [Channel](#), the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

## **Concerns about mental health**

Mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one.

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must speak to the school's DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support which includes speaking to the school lead for Mental Health.

If a child is experiencing low moods, low self-esteem and general anxiety, our school mental health lead will be able to provide some advice about some self-accessed support through relevant approved wellbeing websites and apps. If however, the child is presenting with a concerning level of low mood and anxiety for a period of time then our mental health lead in partnership with the DSL will discuss with the child and their parents/carer to explore options of support.

If, however, a child/young person is at immediate risk the school will recommend they need to be sent to A&E, or dial 999.

## **What all staff need to do to respond if abuse, neglect and exploitation is suspected or been disclosed.**

At **St Louis Catholic Academy** we adopt a whole school approach and safeguarding is everyone's responsibility. Staff and volunteers, and governors must comply with our safeguarding procedures as set out below:

### **Concerns about child-on-child abuse**

In most circumstances, incidences of pupils hurting other pupils will be dealt with under our school's behaviour policy [St Louis Catholic Academy - Policies & Financial Information \(stlouisacademy.co.uk\)](http://stlouisacademy.co.uk). Our child protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put pupils in the school at risk
- is violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

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

- staff must record the allegation on MyConcern online reporting system and report to the DSL, staff should not investigate the matter
- the DSL will assess and consider the relevant next steps which may include, speaking with the child and parents, accessing relevant consultation lines provided to schools by the Local Authority, making a request for support to Children's Services as well as the Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate
- the DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any children involved, including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond, for example off-site activities and school transport
- the DSL will speak to the child and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs
- if the incident is a criminal offence school have a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting children and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child
- our DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their

access to education, although at times some restrictions or adaptations may be required to manage identified risk.

## **Creating a culture where children feel safe in school and minimising the risk of all forms of abuse.**

We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect and exploitation irrespective of from whom and where this comes from, including child-on-child abuse. Creating a supportive environment where children can feel confident in reporting incidents is key to our safeguarding culture in St Louis Catholic Academy.

We expect all staff to:

- challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- ensure pupils are able to easily and confidently report abuse using our reporting systems
- reassure victims that they are being taken seriously
- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems in the school or elsewhere that could be addressed by us updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with our safeguarding partners
- consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment.

Our staff are trained to understand:

- how to recognise the signs of child-on-child abuse, and know how to identify it and respond to reports
- even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an open mind and attitude of “it could happen here”
- if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told; and always speak to the DSL should they be unclear
- children may not always make a direct disclosure and therefore they must be aware that:
  - children can show signs or act in ways they hope adults will notice and react to; it may be that their difficulties emerge from behaviour when they do not have the language to express themselves
  - a friend of the child may share information to a staff member or make comments; professionally curiosity is key, do not fear exploring the information and asking open ended questions
  - staff overhear a conversation between children
  - a child’s behaviour may change suddenly with no clear reason or precipitating event that might offer some explanation

- some children can face additional barriers to telling someone, for example they have a disability, special educational need, age gender, ethnicity and/or sexual orientation etc.
- one child's concerning/abusive behaviour towards another could be an indicator of that child having been harmed themselves.

### **If a child makes a disclosure to a member of staff or volunteer**

All staff are aware they should always be prepared as children can disclose spontaneously to any one anywhere.

We cannot, and do not, assume that all children and their families have the ability, understanding, language and resilience to convey any difficulties they may experience. It is key to our school ethos to recognise the needs of children and their families and to recognise and provide support where English may not be their first language and/or the children or family members have special educational needs; and without doing so may impede their ability to represent their voice, wishes and feelings.

All staff know that we place the voice of children at the centre of everything we do and endeavour to place their best interests at heart. We ensure we know who our children are, staff are encouraged to be curious by speaking and listening to children whilst respecting any protected characteristics. We hope our children have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

Staff also know that children may not always feel ready or know how to tell someone that they are being abused, neglected or exploited and do not always recognise their experiences as harmful.

We listen to children by:

- showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves
- encouraging children to tell their story in their own words
- avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions / prompts.

We reassure children by:

- making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff
- we let a child know it is not their fault as children are often made to feel blame by those harming them
- never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

### **Recording concerns**

Our staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of children. Our staff are clear that they must:

- record all conversations relating to any level of concerns on our recording systems; ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words
- inform the DSL about their concern as soon as possible; where the concern involves a disclosure or concern that the child is at risk of harm they must inform the DSL immediately.
- Use *My Concern* to record

Our staff are aware that such information is confidential and should be shared with the DSL only who may hold additional information about the child and their family, and therefore can form a view on its significance and whether any action is required. Staff will not share information amongst themselves and will not share the information outside of the formal reporting process unless asked to by the DSL. This ensures that information is shared without delay enabling the DSL to carry out any necessary functions of their role whilst upholding confidentiality for the child and their family.

## **What school staff should do if they have concerns about a child**

**St Louis Catholic Academy** is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children in the school. As outlined above, all our staff are clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them.

Our staff are aware that children can share information with anyone in our school but there are clear reporting processes when such information sharing raises concern about their welfare. Children may talk about worries and anxieties around friendships and school life which they need to support with but on other occasions they may share information about their family life which indicates that the children and their family may be in need of help and/or fear or experiences which cause staff to be concerned about whether they have been harmed or are at risk of being harmed. Where such situation arises, our staff are clear on the reporting processes.

Any member of staff, including supply teachers, contract workers, volunteers, governors and who has any concerns about a child's welfare should:

- maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality
- reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with
- record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rationale for this. Also ensure you make a note of any injuries observed or described by the child (*if it is the latter two*)
- consider if the child needs medical attention and if so prioritise ensuring they receive this
- you must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the school's DSL/deputies
- record what the child or other has disclosed in their language or describe what you have seen or suspect and your rationale for this (*if it is the latter two*)

The DSL, deputy or alternate DSLs will:

- Ensure MyConcern is used to record the incident
- DSL or deputy will speak to the child to verify their wishes and feelings, contact the child's parents or carers to either inform them of the concerns and also to gauge their view (it will be at the discretion of the DSL team to carefully consider if this action may place a child at further risk, e.g. if the child has disclosed abuse and neglect caused in the family home)
- if the child has not suffered significant harm as defined by the Children Act, DSL may also decide to seek advice through the Suffolk Professional Advice line. The purpose of these are to support DSLs to consider the best options to engage children and their families with an offer of early help support, preventing escalation where possible but also request for support via Children's Services where necessary.
- if it is immediately apparent that a child has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the school's DSL will make a referral to Children's Social Care to request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police.

### **What will the Local Authority Children's Social Care do?**

Within one working day of a referral being made, a social worker should acknowledge its receipt to the school's DSL and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required
- any services are required by the child and family and what type of services
- the child is in need and should be assessed under section 17 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process
- further specialist assessments are required to help the Local Authority to decide what further action to take
- the DSL or deputies should follow up if this information is not forthcoming.

Anyone working/volunteering with children can make a referral, if in an emergency staff are unable to locate or do not have time to inform DSL of a serious concern, the following process must be followed without delay.

### **Making a referral to Children's Services and/or requesting support**



Professional referrals are made using the online referral form located on Suffolk Safeguarding Children Partnership [Concerned — Suffolk Safeguarding Partnership \(suffolksp.org.uk\)](http://suffolksp.org.uk) (consent is needed from parents and carers, unless to do so may place a child at risk).

If someone is in danger or a crime has also been committed call the Police on 999.

### **What children and young People need to know and do to report safeguarding concerns (abuse neglect and exploitation)**

At **St Louis Catholic Academy** we cultivate a culture of openness and transparency and want to make it clear to all our pupils/students that we are available at any time to listen to you and will always take your concerns seriously, however small you may consider them to be.

Our pledge is:

- we will ensure we provide you with the space away from public areas for you to talk
- we will listen without judgement and endeavour to respect your wishes and feelings
- we want you to feel safe and we will be honest about our duty to prioritise your wellbeing and longer term safety, this means, depending on the circumstances, we cannot offer you total confidentiality. We understand that this may create uncertainty, but we are confident that often when matters are dealt with as they emerge the longer-term prospects can be much improved for you and your family
- we will respect your place but if we consider that you have suffered significant harm or are at risk of harm we will need to share this information so that you and your family can be offered the right support. We will be clear on what information needs to be shared, with whom and how it might be used
- when the concerns suggest you may benefit from early help support this may include considering support to your parents and carers with matters that will improve your situation
- we will provide a named mentor for you so that you can have the confidence and trust to know that you have someone to go to at school if you are feeling vulnerable and experiencing difficulties
- your education and welfare is important to us and we want to reassure you that your experience at school remains positive and you feel safe.

What you can do to report concerns:

- you can speak to any member of staff of your choice. Those staff will listen and support you but we have a team of DSLs in our school who have a specific role to support children and therefore it is likely that the staff members will talk to them or arrange for you to.
- If you are concerned about an immediate risk to the safety of a child please call Customer First on **0808 800 4005**.
- In an emergency, call the Police on **999**.

You can contact the NSPCC Helpline by calling 0808 800 5000 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 10. Online Safety and Filtering

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- protect and educate the whole school community to be safe and responsibly use technology, including mobile and smart technology
- set clear guidelines for the use of mobile phones for the whole school community
- establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education 2024:

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

**Contact** – being subjected to harmful online interaction with other users, for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – online behaviour that increases the likelihood of, or causes harm, for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- the safe use of social media, the internet and technology
- keeping personal information private
- how to recognise unacceptable behaviour online
- ensuring children know not to meet up with a person they have met online without a safe adult
- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.

We will also:

- train staff, as part of their induction, on how to keep themselves safe online as well as children, in line with the school's online safety policy This needs to include issues for example: cyber-bullying, the risks of online radicalisation, and the roles and

responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year

- educate parents/carers about online safety through letters and emails sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- make sure staff are aware of any restrictions placed on them with regards to the use of their personal mobile phone and cameras, *for example that:*
  - *staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present*
  - *staff will not take pictures or recordings of pupils on their personal phones or cameras.*
- make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- make sure all staff, pupils and parents/carers are aware that appropriate staff designated by the Headteacher, have the power to search pupil's phones, as set out in the DfE's guidance on searching, screening and confiscation if there is a concern regarding a child's safety or a crime in which case the Police will be contacted
- put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- carry out an annual review of our approach to online safety
- provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

## **11. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers and contractors**

Section 11 of the 2004 Children's Act places an expectation on our school to have a clear policy in line with HSCP for dealing with allegations against staff who work with children. All staff based within our school will be considered to be in either a position of trust or working with children.

A 'position of trust' is one in which a teacher or other member of staff/volunteer is in a position of power or influence over a child, by virtue of the work or nature of activity being undertaken. [The Sexual Offences Act 2003 \(ss.16-24\)](#) and/or [Crown Prosecution Service Website](#) sets out detailed definitions and a range of criminal offences associated with abuse of such a position.

The Police, Crime, Sentences and Court Act (August 2022) extended the roles which fall into the definition of 'Position of Trust' within the Sexual Offences Act (2003). The new legislation makes it an offence for anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion to engage in inappropriate relationships with those children/young people.

On receipt of any information which raises a concern about any of our staff, the Headteacher, or Chair of Governor, will consider whether the information suggests it is the following:

**Allegation** is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The threshold for an allegation that is considered by the LADO is wider than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, harm. The LADO threshold is, in respect of all people working or volunteering with children in a position of trust, where they have:

- 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
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any information or concern which meets the above threshold should be referred to the LADO service prior to the school taking any action.

**Concern about the Quality of Care/Practice** is an accusation, not of a child protection nature, that the care/practice provided to a child does not meet the standards expected and is about the level of value provided by any care/practice resource, as determined by some measurement. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

These types of concerns should be addressed internally using performance management processes.

**Complaint** is a statement that something is unsatisfactory or unacceptable. A concern may be defined as ‘an expression of worry or doubt over an issue considered to be important for which reassurances are sought’. A complaint therefore can be defined as ‘an expression of dissatisfaction however made, about actions taken or a lack of action’.

These issues must be addressed through internal complaints policy and procedures.

**The two levels of Concerns and Allegations are:**

<p><b>1. Concerns/Allegations that may MEET the harm threshold.</b></p> <p><b>An allegation may relate to a person who works with children who has:</b></p> <ul style="list-style-type: none"> <li>• behaved in a way that has harmed a child or may have harmed a child. (<i>Harm threshold</i>)</li> <li>• possibly committed a criminal offence against or related to a child; (<i>criminal threshold</i>)</li> <li>• behaved towards a child or children in a way that indicates they may pose a risk of harm to children, (<i>suitability threshold</i>)</li> <li>• behaved or may have behaved in a way that indicates they may not be suitable to work with children (<i>transferable risk threshold</i>).</li> </ul>	<p><b>2. Concerns/Allegations that DO NOT meet the harm threshold.</b></p> <p><b>Behaviours that are inconsistent with school's staff code of conduct and other associated policies, or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO), therefore low level concerns LLC) e.g.</b></p> <ul style="list-style-type: none"> <li>• being over friendly with children</li> <li>• having favourites</li> <li>• taking photographs of children on their mobile phone, contrary to school policy</li> <li>• engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or</li> <li>• humiliating children.</li> </ul>
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When concerns/allegations meet the harm threshold **St Louis Catholic Academy** are required to comply with both Part Four of KCSiE and also Suffolk Safeguarding Children Partnership procedures [LADO — Suffolk Safeguarding Partnership \(suffolksp.org.uk\)](http://suffolksp.org.uk)

All staff and volunteers at **St Louis Catholic Academy** are required to immediately report any level of concerns about behaviour and/or conduct of adult working/volunteering with children towards a child to leadership and management. This includes reporting adults who are providing out of school activities/leasing **St Louis Catholic Academy** facilities.

It is important for staff or any person associated with **St Louis Catholic Academy** to know who to report concerns to:



### What happens next

Headteacher/Chair of Governors/ Trust CEO or their nominee may undertake initial inquiries to gather key information. They will assess whether the allegation meets the LADO threshold, if it does they will make a referral to LADO giving consideration to our staff code of conduct. If necessary, they will complete a LADO referral within one working day.

If the allegation does not meet the harm threshold for LADO, our Headteacher/Chair of Governors/ Trust CEO or their nominee will follow the school's Low Level Concerns policy [St Louis Catholic Academy - Policies & Financial Information \(stlouisacademy.co.uk\)](http://stlouisacademy.co.uk).

### Role of LADO

- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** -with the Police, Children's Services and other partner agencies (managers of the subject of allegation).

**Role of school's Case Manager**, includes:

- clarify facts of the concerns/allegation (not investigate) before contacting the LADO
- take part in Strategy Meetings to liaise with other partner agencies

- undertake internal planned inquiries/fact finding
- take part to review the progress of the case in which there is a Police officer investigation
- operate a thorough disciplinary process when appropriate
- ensure a properly managed conclusion and outcome to process.

## **LADO Principles and Response**

**Timeliness** - any allegation of abuse must be dealt with fairly, quickly and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren , and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers **make a referral to LADO within one working day**.

**Objectivity** - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

**Confidentiality** - information about an allegation must be restricted to those who have a need to know in order to:

- protect children
- facilitate enquiries
- avoid victimisation
- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects.

**Support** - parents/carers of a child(ren) involved should be:

- informed of the allegation as soon as possible, provided provision of information and advice at that stage does not impede the enquiry, disciplinary or investigative processes, and may need to be told immediately, e.g. a child requires medical treatment
- helped to understand the process involved and kept informed about the progress of the case
- told that there has been an enquiry or disciplinary process (but no detail is to be provided in relation to any internal HR processes)

- when necessary, helped to understand the outcomes reached
- **Monitoring** - the LADO should monitor the progress of cases either fortnightly or monthly depending on its complexity either via review Strategy Discussions or by liaising with Police and/or Children's Services colleagues, or employer as appropriate. The Designated Officer (or Trust CEO or nominated deputy in the case of the complaint being against the Headteacher) should keep records to ensure that every case is dealt with without undue delay.

**Target Timescales** - it is in everyone's interest for cases to be dealt with as quickly as possible, consistent with a fair and thorough investigation.

### **Concerns that DO NOT meet the harm threshold - Low-Level Concerns (LLC)**

Schools must have a policy in place which outlines the relevant processes and procedures for dealing with concerns raised to them that do not meet the LADO threshold, these concerns are referred to as low-level concerns. The term low-level does not seek to minimise the seriousness of any concerns, the term low-level indicates that it is a concern that is lower than the LADO threshold, but they are still practice concerns that need to be considered with a safeguarding lens and require suitable action through internal procedures of the school. It is important these are managed robustly as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

At **St Louis Catholic Academy** leadership manage LLC using our school's internal due process, if we consider a member of staff has breached our school's code of conduct, depending on the seriousness and impact on a child, we will also liaise with our human resource service:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- empowering staff to share any low-level safeguarding concerns
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- helping identify any weakness in the school's or college's safeguarding system.

Our low-level concerns policy is a reflection and extension of **St Louis Catholic Academy** wider relevant staff behaviour guidance and code of conduct. [St Louis Catholic Academy - Policies & Financial Information \(stlouisacademy.co.uk\)](https://stlouisacademy.co.uk), [Policies - Our Lady of Walsingham Catholic Trust](#)

Concerns may arise from a range of scenarios, e.g. suspicion; complaint or disclosure made by a child, parent or other adult within or outside of the organisation or as a result of vetting checks undertaken.

All staff should know that in line with our school's culture we encourage staff to have the confidence and trust to confide in leadership if they have concerns about adults working or volunteering with children.

We share information responsibly and understand this is on a need-to-know basis

We apply our protocols for recording and storing information confidentially.

We encourage an open and transparent culture, to identify concerning, problematic or inappropriate behaviour early so that we are able to minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and in accordance with the ethos and values of the institution.

The role of our school's case manager and the principles for managing LLC is the same as set out above reporting process parallel to what is set out within the section where concerns meet harm threshold, for example the principles and practice.

If we are uncertain of threshold criteria for either LADO referral or LLC we consult with school's HR and the LADO. At **St Louis Catholic Academy** we have clear codes of conduct and processes in place to deal with any concerns or allegations which do not meet the LADO threshold. Such concerns may arise from suspicion, complaint, safeguarding concerns, or allegation from another member of staff, disclosure made by a child, parent or another outside of the school or pre-employment vetting checks.

### **After-school clubs, community activities and tuition: safeguarding guidance for providers**

**St Louis Catholic Academy** has a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our school premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of **St Louis Catholic Academy** governing body to ensure any organisation that hires the school premises is compliant with the guidance set out in [After-school clubs, community activities and tuition: safeguarding guidance for providers – GOV.UK \(www.gov.uk\)](#) In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

### **Other complaints**

If any of our stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, our school Complaints Procedures can be found on our school website at: [St Louis Catholic Academy - Policies & Financial Information \(stlouisacademy.co.uk\)](#)

### **Whistleblowing**

At **St Louis Catholic Academy** we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the school's safeguarding practice and arrangements so they can be addressed appropriately.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding procedures and arrangements.

### **Examples where Whistleblowing may apply:**

- pupil's or staff member's health and safety are being put in danger
- failure to comply with a legal obligation or statutory requirement



- attempts to cover up the above, or any other wrongdoing that is in the public/school interest
- do not delay! Your concerns should be taken seriously and investigated, and your confidentiality respected
- you should report your concern to the Headteacher/other member of staff on the SLT, and if concerns are about the Headteacher, report to the Chair of the Governing Board, Trust CEO or their Deputy CEO.
- If, for any reason, there are difficulties with following the above procedure, you can whistle blow directly to Suffolk Safeguarding Partnership: If you are concerned about a child or an adult, you can call Customer First on 0808 800 4005 (this is a freephone number). and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 12. Record Keeping

**St Louis Catholic Academy** will hold records confidentially, safely, securely and in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached, and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child (we store these electronically on MyConcern).

Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

### Receiving in and transferring pupil records to other education provision

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or
- **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child.

### Retention, archiving and destruction of records

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

- a clear retention policy
- secure and appropriate system to archive with restricted access
- we have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

## 13. Safeguarding Training and Development

All staff receive approved safeguarding and child protection training (including online safety) so that everyone understands the expectations, applicable to their role and responsibilities. We ensure that all staff and volunteers continuous professional development (CPD) is maintained and keep a record of this. In addition to statutory training all staff receive regular updates and CPD via email, e-bulletins, and staff meetings.

At **St Louis Catholic Academy** we access training in line with our statutory requirements in Keeping Children Safe in Education, local expectations set out by Suffolk Safeguarding Partnership and recommendations of good practice.

<b>Safeguarding Children Induction</b>	
<i>All staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. Part one, KCSiE</i>	
<p><b>Training type:</b> Safeguarding Children Induction  <b>Professional standard:</b> Essential awareness  <b>Status of training:</b> Statutory requirement</p> <p><b>Frequency, duration, and delivery method:</b></p> <ul style="list-style-type: none"> <li>• Within the first week of commencing in post</li> <li>• One hour PowerPoint presentation and provision of schools associated policies and CP procedures</li> <li>• Face to face in school or virtual.</li> </ul> <p><b>Targeted delegates:</b> All staff including deputy DSLs, supply teachers, volunteers, and contractors.</p> <p><b>Training provider and delivered by:</b> Child Protection School Liaison Service produce materials for DSL to deliver.</p>	<p><b>Aims:</b> To ensure that all staff/volunteers are made aware of systems within their school or college which support safeguarding children.</p> <p><b>Learning Objectives:</b> To ensure that all staff know:</p> <ul style="list-style-type: none"> <li>• <b>Child protection policy:</b> The process for responding to all forms of harm but in particular child-on-child abuse, directly and online</li> <li>• <b>Behaviour policy:</b> how to prevent prejudice-based discriminatory bullying</li> <li>• <b>Code of conduct:</b> reporting low-level concerns, allegations against staff and whistleblowing</li> <li>• <b>Safeguarding children absent from education:</b> Looking out for patterns of repeat occasions and prolonged periods</li> <li>• <b>Role of the Designated Safeguarding Lead (DSL):</b> Who are they and how to share information about concerns.</li> <li>• <b>Part one KCSiE:</b> Copies of this will be issued at induction with expectation that staff read and sign to say they understand their role in accordance with this guidance.</li> </ul>
<p><b>Staff receive refresher training and weekly briefings</b>  <b>All records of training are kept electronically</b></p>	

## 14. Quality Assurance, Improvement and Practice

**St Louis Catholic Academy** endeavours at all times to provide an education and learning where children feel safe and are kept safe by all staff. One way we review and monitor our practice is through auditing: it is important that we are aware of the level of our school's compliance to key guidance, such as KSCiE. We want to be open, transparent and reassure ourselves and our stakeholders, including regulators, what we are proud of and what we need to strengthen to meet our own ambitions for standards. It is therefore standard practice that we factor in on-going auditing schedule objectivity and scrutiny by our Governing Body/Trust leaders and all Senior Leadership.

We also commission other scrutineers to help us seek reassurance of our practice, e.g. Safeguarding reviews and MyConcern auditing.

Parents and carers please note that schools designated leads for safeguarding access the Suffolk Professional Advice Line service to talk about concerns they may have about a child, young person.

This policy will be reviewed **annually** by the Headteacher. At every review, it will be approved by our Local Governing Body.

## 15. Additional Associated Safeguarding Policies and Procedures

See below additional associated safeguarding policies for St Louis Catholic Academy and Our Lady of Walsingham MAT [St Louis Catholic Academy - Policies & Financial Information \(stlouisacademy.co.uk\)](http://stlouisacademy.co.uk), [Policies - Our Lady of Walsingham Catholic Trust](#)

- Acceptable Use of ICT
- Administering Medicines Policy
- Allegations of Abuse Against Staff
- Anti Bullying Policy
- Attendance
- Behaviour Policy
- Complaints Procedure
- Data Protection
- Early Years Policy
- Educational Visits
- Equality Diversity and Action Objectives
- Fire and Evacuation Policy
- First Aid and Allergens Policy
- Freedom of Information Act Publication
- Health & Safety Policy

- Lettings Policy
- Low Level Concerns Policy
- Mobile Phone Policy
- Online Safety Local Policy including Filtering and Monitoring
- Parent and Carer Code of Conduct
- Personal Care Policy
- PREVENT Policy
- Protection of Biometric Information of Children
- Public Sector Equality Duty
- RSE Policy
- Safer Recruitment and Selection
- Special Educational Needs (SEND) Policy
- Supporting Children with Health Needs who Cannot Attend School Policy
- Health and Safety
- First Aid
- Staff disciplinary procedures, which will be used if staff breach this code of conduct.
- Staff grievance procedures
- Whistleblowing
- Teachers' standards
- Teaching assistant regulations