



Safeguarding and Promoting Welfare of Pupils Policy

Legal Status

- This policy complies with Part 3, paragraphs 7 (a) and (b) of the Education (England) Regulations 2014 and in force from the 5th January 2015.
- Keeping Children Safe in Education (KCSIE): Information for all school and Academies (DfE: September 2018) incorporating statutory guidance, Disqualification under the Childcare Act 2006 (February 2015) and also refers to non-statutory advice for practitioners. What to do if you're worried a student is being abused (HM Government: March 2015) Updated with KCSE 2018 amendments
- Working Together to Safeguard Students (WT): A guide to inter-agency working to safeguard and promote the welfare of students (HM Government: 2015) which also refers to non-statutory advice, Information sharing HM Government: March 2015)
- The policy is also consistent with any other relevant and current regulations issued by the Secretary of State and any other guidance concerning Safeguarding Students to which schools are obliged to have regard.

Applies to

The whole Academy and all other activities provided by the Academy, inclusive of those outside of the normal Academy hours; all staff (teaching and support staff), contractors, supply staff, agency staff, students on placement, the Trustees and Local Governing Body and volunteers working in the Academy.

This policy has been compiled in conjunction with and reference to the following related documents which are available on the Great Western Academy website and also on request from the school office:

- Anti-bullying policy
- Behaviour Management policy;
- First aid policy;
- Educational Visits and Offsite activities policy;
- E-Safety including Cyber Bullying;
- Personal Social and Health Economic (PSHE) education policy;
- Special Educational Needs and Disabilities;
- Spiritual, Moral, Social and Cultural (SMSC) Education policy;
- Whistleblowing policy;
- Staff Code of Conduct;
- Safer Recruitment policy.

Availability

This Policy is made available to parents, staff and pupils via the Academy website and on request a copy may be obtained from the main office.

Monitoring and Review

This policy is subject to continuous monitoring, refinement and audit by the Principal and Designated Safeguarding Lead (DSL). The Proprietors and Board of Directors will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. This policy will be reviewed no later than May 2018, or earlier if changes in legislation, regulatory requirements or best practice guidelines so require. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.

Signed	Date	Signed	Date
Principal		Chair of Trustees	

Contents

Legal Status	1
Applies to	1
Availability.....	1
Monitoring and Review.....	1
1. Introduction	3
1.1. Purpose	3
1.2. Context.....	3
1.3. Aims.....	3
2. Key Contacts.....	3
3. Responding to allegation of abuse.....	4
4. Whole Staff Responsibilities	5
5. Induction and on-going training for all staff and the Principal.....	5
6. Designated Safeguarding Lead (DSL), Deputy DSL and their Responsibilities (including the Prevention of Radicalisation).....	6
7. Prevent Duty (Safeguarding Pupil/Students who are vulnerable to extremism)	6
8. Governance	7
9. Safe working practices for the safeguarding and protection of students and staff at Great Western Academy	7
9.1. Safer Recruitment	7
9.2. Staff responsibilities.....	7
9.3. Recording Process	8
9.4. Response to concerns	8
9.5. Missing Students.....	9
9.6. Use of mobile telephones and cameras.....	9
9.7. Allegations of student on student abuse	9
9.8. Vulnerable students.....	9
9.9. Disabled students.....	9
9.10. Working in Partnership and Responding to Parents and Carers	10
9.11. Listening to the wishes of students and young people	10
9.12. Record-keeping	10
9.13. Whistleblowing	11
9.14. Death of a student	11
10. Quick referral flowchart.....	12
11. Deficiencies and weaknesses	13
12. Complaints	13
Appendix	14

1. Introduction

1.1. Purpose

In Keeping Students Safe in Education (KCSIE) (DfE September 2018) safeguarding is defined as: protecting students from maltreatment; preventing impairment of children's health or development; ensuring that students grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all students to have the best outcomes. Great Western Academy fully subscribes to this definition.

The purpose of this policy is to provide staff, volunteers and the Board of Directors with the guidance they need in order to keep students safe and secure in our school and to inform parents and guardians how we will safeguard their students whilst they are in our care.

1.2. Context

We recognise that students and young people have a right to feel secure and cannot learn effectively unless they do so. Parents, carers and other people can harm students either by direct acts or failure to provide proper care, or both. Students may suffer neglect; emotional, physical or sexual abuse or a combination of such types of abuse. All students have a right to be protected from abuse. Whilst the school will work openly with parents as far as possible, the Academy reserves the right to contact Children's Social Care or the Police, without notifying parents if this is in the student's best interests. Our students have the right to respect and protection from abuse, regardless of age, gender, religion, race, nationality, sexuality, culture or disability. This Safeguarding Policy is also dove-tailed with the Behaviour Management and Antbullying Policies.

We are committed to creating an environment where staff feel able to raise concerns (in accordance with locally agreed inter-agency procedures) and to feel supported in their safeguarding role. Keeping Students Safe in Education (DfE: 2018) makes it clear that anybody may make a referral to external agencies, if necessary. While it would be more common for the Designated Safeguarding Lead to make referrals to external agencies, it is most important that all adults understand that our threshold for taking action is not be placed unnecessarily high, perhaps leading to a failure to react to borderline cases.

This policy document gives advice on actions our staff should take when receiving a disclosure – including avoiding asking leading questions and explaining that confidentiality cannot be promised. Advice on the need to keep clear notes, and to reassess concerns where situations do not seem to be improving, to share information quickly, or where there is inaction, is included in this policy. Staff should also be familiar with the protections provided by the Whistleblowing Policy (which is on the Academy website) and the information contained in the Staff Handbook. In preparing this policy we have been attentive to the nature, age range and other significant features of the school in the provisions made for safeguarding. In Great Western Academy with an age range from 11-18 we are aware of the potential scope for problems relating to emotional health issues, body image, eating disorders, self-harm, and also radicalisation and extremism. Within the curriculum and Spiritual, Moral, Social and Cultural education, we instil within students' values that build resilience and prevent young people being drawn into radicalisation and extremism.

1.3. Aims

The aim of Great Western Academy's procedures is to prevent students being abused and to safeguard and promote the welfare of students at the Academy. Great Western Academy prides itself on respect and mutual tolerance. Parents, guardians and carers have an important role in supporting the school and open communications are essential which is why copies of this policy and others relating to issues of student protection are on our website.

2. Key Contacts

Our Academy's Designated Safeguarding Lead (DSL) and his Deputy are also the Prevent Officer and Deputy Prevent Officer for the Academy and responsible for the prevention of radicalisation, extremism and being drawn into terrorism. Both are members of the Senior Leadership Team (SLT) and have the status and authority within

the school to carry out the duties of the post. This includes student protection referrals, raising awareness, training, liaising with the local authority children's agencies as appropriate, committing resources and supporting and directing staff. Their telephone numbers are prominently displayed in the Academy. In all matters relating to student protection the Academy will follow the procedures laid down in this policy.

The Great Western Academy DSL and Deputy DSL with lead responsibility for student protection are:

Designated Safeguarding Lead (DSL) and Prevent Officer for the school

- Graham Davis, Principal, is the Designated Safeguarding Lead (DSL) for the whole school Contact details: telephone: 01793 209700 Email: office@gwacademy.co.uk

Deputy Designated Safeguarding Lead (DSL) and Deputy Prevent Officer for the Academy

- Laura Winsbury, SENDCo is the Deputy Designated Safeguarding Lead (DSL) for the whole school Contact details: telephone: 01793 209700 Email: office@gwacademy.co.uk

Nominated Governor for Safeguarding and Prevent Duties

Andrew Wild is the nominated Governor for Safeguarding who will liaise with the local authority on issues of student protection. Contact details: telephone: 01793 209700 Email: office@gwacademy.co.uk

Great Western Academy will maintain a good working relationship with the Swindon Local Safeguarding Children Board. This is an independent statutory board that ensures everyone is working together for the safety and wellbeing of students and young people in the area and Great Western Academy communicates readily with them. The website address for the LSCB is www.swindonlscb.org.uk. Copies of the LSCB procedures are available from the school on request. Email: lscb@swindon.gov.uk. telephone: 01793 463803

The Local Authority Designated Officer (LADO) is an essential point of contact. Tel: 01793 466849. The Swindon LADO can also be contacted through the local Multi-Agency Safeguarding Hub (MASH).

The telephone number for MASH is 01793 466903.

The Emergency Duty Service (out of hours) can be contacted on 01793 436699

Wiltshire Police, if required, can be contacted on 101 (999 in an emergency)

Further possible useful contacts include:

- Ofsted Piccadilly Gate, Store Street, Manchester, M1 2WD Tel: 03001234234 Email: enquiries@ofsted.gov Web: www.ofsted.gov.uk
- Disclosure and Barring Service (DBS) Address for referrals: PO Box 181, Darlington, DL1 9FA
- Telephone for referrals: 01325 953 795 Telephone for customer services: 0870 909 08 Email: customerservices@dbs.gsi.gov.uk
- NSPCC Student Protection Helpline: 0808 800 5000
- Studentline: Tel: 0800 1111 www.studentline.org.uk

3. Responding to allegation of abuse

The following procedures apply to all staff, including the Principal, volunteers and Board of Directors. The procedures apply whether the allegation involves a student at the school or a child outside of the school setting. In order to prevent any possible delay, all staff recognise that safeguarding is everyone's responsibility and know that they can make a referral to the LADO directly if they wish.

- If an allegation is made against anyone working in the school (inclusive of volunteers), the DSL must be informed who will contact the LADO to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action.
- If an allegation is made against the DSL/Principal, then the Governor for Safeguarding should be informed who will then contact the LADO without contacting or notifying the DSL/Principal.
- If the allegation is made against the proprietors or members of the Board, the Principal will, without informing the member of the Board in question, contact the LADO. The other members of the board or other proprietors will be kept informed, unless the allegation also relates to them.

Great Western Academy will carefully consider whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. We give due weight to the views of the LADO and to our policy when making a decision about suspension.

All unnecessary delays should be eradicated. In borderline cases, this can be done informally and without giving names in the first instance. The Academy will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police are informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the student/students agreed. If there are suspicions or an allegation is made against anyone who does not work at the school, the DSL (or in their absence the Deputy DSL) must be informed as soon as practical. The DSL will immediately, or at least within 24 hours, contact the LADO.

4. Whole Staff Responsibilities

Great Western Academy recognises that because of regular and sustained contact with students, school staff are well placed to observe the outward signs of abuse. Great Western Academy will therefore:

- establish and maintain an environment where students feel secure, are encouraged to talk and are listened to
- ensure students know that there are adults in the school whom they can approach when they have concerns
- include opportunities in the Personal, Social, Health and Economic (PSHE) curriculum for students to develop the skills they need to recognise and stay safe from abuse
- ensure policies and procedures are applied with due common sense and sensitivity
- treat all disclosures with the strictest confidence
- ensure that parents have an understanding of the responsibility placed on the school and its staff for child protection by setting out its obligations in the school handbook and that parents are offered a copy of the policy on request
- notify parents of our concerns, and provide them with opportunities to change the situation, where this does not place the student at greater risk
- develop effective links with the LSCB and cooperate as required with their enquiries regarding child protection matters including attendance at Child Protection Case Conferences
- liaise with other agencies that support children through normal referral routes and the CAF process.

5. Induction and on-going training for all staff and the Principal

Induction training for all new employees in a regulated activity (including temporary staff) takes place either before or on the day the person starts at the school. This includes:

- Child Protection Training Level 1
- identity and function of DSL, safeguarding policy and procedures, staff conduct and teachers' standards (including the whistleblowing procedure),
- part 1 of Keeping Students Safe in Education - the latest edition being September 2018.

Great Western Academy ensures that sufficient relevant staff are trained in safer recruitment processes. Great Western Academy delivers INSET on anti-bullying, e-safety including cyber bullying along with the implications for mental health. The active promotion of British values and an understanding of extremism and radicalisation.

All new staff are given and read the latest KCSIE document as part of their induction. All other staff are provided with and read all updated KCSIE documents. All staff are expected to confirm in writing that they have read and understood our core policies including this Safeguarding Policy.

6. Designated Safeguarding Lead (DSL), Deputy DSL and their Responsibilities (including the Prevention of Radicalisation)

The DSL has the status and authority within the Academy to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. The DSL is the first point of contact for external agencies who are pursuing Student or Adult Protection investigations and co-ordinates the School's representation at Student or Adult Protection conferences and Core Group meetings (including the submission of written reports for conferences). However, if required, the Deputy DSL is able to undertake these responsibilities. Temporary, supply, and contracted staff are made aware of the arrangements for safeguarding and reporting concerns according to this policy. With reference to managing referrals, the broad areas of responsibility (in line with the requirements of KCSIE: September 2018) for the DSL are:

- to refer all cases of suspected abuse to Children's Social Care and/or the LADO for child protection allegations which concern a member of staff, or the Disclosure and Barring Service where a person is dismissed or left due to risk/harm to a student and/or the police if a crime may have been committed;
- to liaise with the Trustees and Local Governing Body to inform them of issues especially ongoing enquiries under section 47 of the Children's Act 1989 and police investigations and to act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

The DSL and the Deputy DSL receive Child Protection Level 3 training every two years.

7. Prevent Duty (Safeguarding Pupil/Students who are vulnerable to extremism)

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The Local Governing Body, Principal and staff are fully aware of their duty of assessing the risk in this international school of our students being drawn into terrorism including support for terrorist ideology fundamental to which are extremist ideas. It is incumbent on us to be vigilant in ensuring that our students are safe from extremist and terrorist material when accessing the internet. Integral to our e-safety strategy is ensuring that appropriate filtering is in place. We take into account the GWA arrangement to fulfil Prevent duties. This is achieved through the curriculum, our management of E-safety, being aware of student behavioural changes, being alert to any attempted external influences on the school and of, course through staff training. In addition to prevent training for the designated safeguarding lead and deputy lead this will also be expanded to include all coaches. Our school promotes young people in making positive choices about their lives and endorses the Channel early intervention scheme for students who could be at risk of radicalisation.

Our Academy, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Person. The SPOC for Great Western Academy is the DSL.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC. Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

All Prevent training will be refreshed every three years.

8. Governance

The safeguarding function of the Local Governing Body as a whole includes:

- monitoring the policy, procedures and the efficiency with which they are carried out;
- ensuring that there are clear job specifications for the DSL and the deputy DSL;
- allocating adequate time allowance, funding, supervision and support which will enable fulfilment of these job specifications with regard to student welfare and safeguarding responsibilities;
- regularly reviewing the practice of safeguarding within the school, and giving opportunities for any concerns to be voiced;
- ensuring that all Board Members have an understanding of the methodology of the teaching of safeguarding issues within the school.

The safeguarding function of the Governor appointed for safeguarding includes:

- having responsibility for the monitoring of the safeguarding process alongside the DSL and the dissemination of that process to the Board of Directors, and then producing and presenting an annual detailed report and minutes with the DSL to the Board of Directors;
- ensuring that the report and minutes are sufficiently detailed to demonstrate both the breadth and the depth of the review;
- having responsibility for ensuring that the DSL has informed all staff (teaching, non-teaching, contractors, agency staff and volunteers) of the policy content, has checked their understanding of it and is monitoring the policy in practice.

9. Safe working practices for the safeguarding and protection of students and staff at Great Western Academy

9.1. Safer Recruitment

Great Western Academy follows robust procedures when recruiting staff to ensure that only appropriate people are recruited to work with our students. This is detailed in our Safer Recruitment Policy.

9.2. Staff responsibilities

It is essential that all staff, the Governing Body /Trustees of Great Western Academy Trust are aware of how to pass on any concerns about other members of staff or volunteers and be conscious of how they should conduct themselves to minimise the risk of finding themselves as the subject of any student protection processes. The prime concern at all stages must be the interests and safety of the student. Where there is a conflict of interests between the student and parent, the interests of the student must be paramount.

All cases of suspected student abuse should be given the highest priority. The following sequence of events should be adhered to. Where a member of staff or a Governor/Trustee thinks there might be reasonable grounds for suspecting abuse they should:

- LISTEN to what the student has to say and take them seriously; reassure the student but advise that you cannot promise to keep a secret. If there is a requirement for immediate medical intervention, assistance should be called for.

- RECORD in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the student and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. YOU MUST NOT INVESTIGATE THE INCIDENT, ASK LEADING QUESTIONS OR REPEATEDLY QUESTION/ASK THE STUDENT TO REPEAT THE DISCLOSURE OVER AND OVER.
- REPORT all suspicions, concerns, instances and allegations of actual or suspected student abuse or neglect immediately to our Designated Safeguarding Lead (DSL). In the absence of the DSL inform the Deputy DSL.
- REMEMBER – speed is essential. The DSL will then provide advice, instruction and direction as is relevant.

All school staff should be aware of the signs of abuse and neglect so that they are able to identify cases of students who may be in need of help or protection. Staff members working with students are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a student, staff should always act in the interests of the student. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure they should always speak to the Designated Safeguarding Lead.

9.3. Recording Process

Great Western Academy uses the following pro-forma relevant to safeguarding:

- Safeguarding Concern Form – for the recording of incidents and concerns that arise in relation to student safety and well-being (completed by a member of staff in the event of a concern or a disclosure, usually immediately and with the assistance of DSL or Deputy DSL). All Safeguarding Concern Forms are reviewed by the DSL and, monthly, by the Governor with Responsibility for Safeguarding. The form is always available from the DSL or Deputy DSL.
- Behaviour Incident Form – to record the details and sanctions in relation to student misbehaviour
- Register of vulnerable students
- Register of Students with Medical Conditions

Anti-bullying Log – a log of bullying incidents and how they are dealt with by the school

9.4. Response to concerns

The DSL has responsibilities following a report of concerns from a member of staff.

The DSL must make a referral to the LADO within 24 hours if there is a disclosure or an allegation of abuse, or reasonable cause to suspect a student is at risk of, or is suffering, significant harm.

- If there are grounds for concern, the DSL must contact the LADO. This will always be done where there is a disclosure that relates to student-on-student abuse within the school or abuse that relates to events outside the school.
- The DSL will make a clear statement of the known facts, any suspicions or allegations and whether or not there has been contact with the student's family
- If the DSL feels unsure about what the student has said or what has been said by others then the DSL can telephone the LADO to discuss concerns. To do so will not constitute a student abuse referral and may well help to clarify a situation.
- If any disclosure or allegation is made with regard to a member of staff the DSL will make a referral to the LADO, and will do so within 24 hours of a disclosure and ideally within one hour.
- If there is not a disclosure or an allegation of abuse, or reasonable cause to suspect a student is at risk of, or is suffering, significant harm, the DSL may still choose to contact the LADO to elicit advice, and will then either move to a formal referral or actively monitor the situation.
- If, at any point, there is a risk of immediate serious harm to a student a referral should be made to children's social care and the police immediately. Anybody can make a referral. The student can be kept in school if

advised to do so by these agencies. The parent should be informed and a decision should be made with the LADO/police about who should do this.

- Normally, the DSL will try to discuss any concerns about a student's welfare with the family and where possible to seek their agreement to making a referral to the LADO if necessary. However, in accordance with DfE guidance, this will only be done when this will not place the student at increased risk. The student's views will also be taken into account.

Where there are doubts or reservations about involving the student's family, the DSL should clarify with the LADO or the police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the student and that the school will be involved in the enquiry or police investigation, as per the Students Act 1989.

9.5. Missing Students

A student going missing from an education setting is a potential indicator of abuse or neglect. Our staff will follow the school's procedures for dealing with students who go missing, particularly on repeat occasions. There could also be implications for such students regarding radicalisation and exposure to extremist views and possible terrorism. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation. Staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Great Western Academy is vigilant about the completion of its admission register and an attendance register.

9.6. Use of mobile telephones and cameras

In general, staff should not use mobile telephones in the presence of students. The recording of images of students by any means is a particularly sensitive subject and one which staff and the Board of Governors are made aware of for both the students' and their own safety. Any images or recordings should only be edited or stored on school computers unless with the express permission of the Principal. Personal mobile telephones should never be used for these purposes, and photographs or recordings should only be made where there is a legitimate school purpose. A pupil's privacy and dignity must be preserved at all times. Images or recordings should not be transmitted to third parties without permission of the Principal or parents of the student involved. This guidance also applies to all students.

9.7. Allegations of student on student abuse

Allegations of abuse by one or more student on another student: In circumstances where there is an allegation of abuse by one or more students against another student, it is essential that all students involved, whether perpetrator or victim, are treated as being 'at risk'. The procedures for dealing with such abuse, where there is 'reasonable cause to suspect that a student is suffering or likely to suffer, significant harm' are that the allegation or disclosure must be reported to the DSL immediately, but at least within 24 hours of it becoming known. We will refer student-on-student abuse to an external safeguarding agency where there is a risk of significant harm. The DSL will report to the LADO as above. Reference should also be made to Great Western Academy's Anti-Bullying Policy.

9.8. Vulnerable students

Particular vigilance will be exercised in respect of pupils who are recorded on the School's Record of Vulnerable Students or the Record of Students with Medical Conditions.

9.9. Disabled students

Disabled students have exactly the same rights as non-disabled students; to be safe from abuse and neglect, to be protected from harm and to achieve the 'Helping Students Achieve More' outcomes. Disabled students experience greater risks, vulnerability and unequal access to services and resources. They may have additional needs relating to physical, sensory, cognitive and/or communication impairments. Our staff receive relevant

training to raise awareness and have access to specialist staff in the event they have concerns regarding abuse of a disabled student. Some disabled students may be more vulnerable to abuse because they may:

- have fewer outside contacts than other students; receive intimate, personal care
- have an impaired capacity to resist or avoid abuse; have communication difficulties
- fear losing services; be more vulnerable to peer abuse (e.g. bullying, sexual assault, intimidation).

9.10. Working in Partnership and Responding to Parents and Carers

Our school works in partnership with parents/guardians/carers and local authorities communicating as clearly as possible with them (in particular with parents for whom English is not their first language) for the best outcomes for students. The Principal/DSL must be notified of a concern before involving parents/guardians/carers in conversations about abuse. Parents/guardians/carers will be informed as soon as possible where appropriate about any concerns regarding their students. Parents/guardians/carers will usually be told the source of a referral if it comes from a professional agency e.g. a school. However, members of the public can ask to remain anonymous. The parent/guardian/carer will normally be contacted before a referral is made to the LSCB.

However, if the concern involves alleged or suspected sexual abuse, honour based violence, fabricated or induced illness or the DSL has reason to believe that informing the guardian at this stage might compromise the safety of the student, or a staff member, there will be no contact by the school prior to the referral (although the reasons for this course of action will be documented on the referral).

Where a student sustains a physical injury or is distressed as a result of reported chastisement, or alleges they have been chastised by the use of an implement or substance, this will immediately be reported for investigation to the LSCB. Referrals will be confirmed in writing. The Academy recognises the need to be alert to the risks posed by strangers or others (including the parents, guardians or carers of any students) who may wish to harm students in or out of the Academy.

Parents/guardians/carers are reminded that in matters of parental contact or residency, the Academy will not act as a mediator for parents. The Academy will seek to protect the interests of the student, first and foremost. Parents who expect the Academy to actively take sides outside the best interests of the student will find that their student is referred to the appropriate relevant agency to protect the student from being at risk of emotional harm. Contact orders (student access) must be given to the Academy by the parents so that these can be meticulously followed, including any timely revisions, in accordance with our school's terms and conditions. Parents are informed of our safeguarding responsibilities; this policy is available on the Academy's website and from the main office. Great Western Academy does not give out contact information/personal details to other parents, without permission.

9.11. Listening to the wishes of students and young people

Great Western Academy ensures that students' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual students, acting in their best interests. We believe it is critical that our students have an adult who they can trust and Great Western Academy ensures that there are appropriate systems so students know who they can turn to and that staff will listen to them. These include:

- Personal Coaches
- PSHE Curriculum
- Helplines such as NSPCC and Student line (Contact numbers are at the bottom of this policy).

9.12. Record-keeping

Written notes will be kept of all incidents relating to individual students. This information may be shared with other agencies; the views of the student who is the subject of the concern will be taken into account but staff will be alert to the dangers of keeping "secrets". All contact with parents and external agencies will be logged and

kept in Student Protection records which are kept separate from educational records and can only be accessed by designated people within the Academy.

If a student is withdrawn from the Academy, all efforts will be made to identify the school to which the student is being admitted; their confidential educational and student protection records will be sent separately.

9.13. Whistleblowing

Our whistleblowing policy is integrated into training and codes of conduct. We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within our school and to external agencies where necessary. This is one part of the way in which we establish in our Academy, a positive safeguarding culture. We have a culture of safety and raising concerns. There are procedures for reporting and handling concerns, and provision for mediation and dispute resolution where necessary.

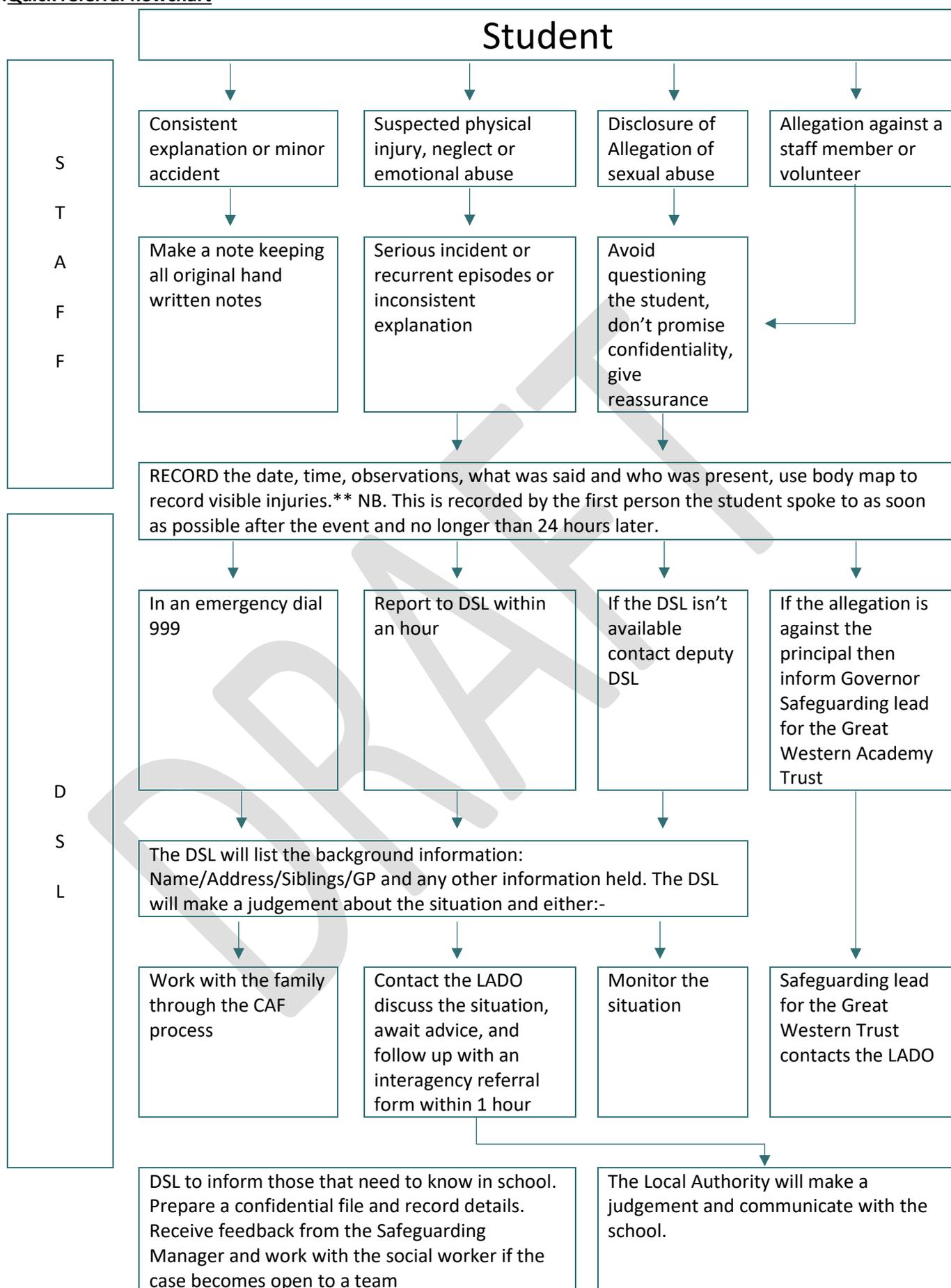
9.14. Death of a student

In the event of a death of a student the Principal must notify the local Child Death Overview Panel (CDOP). Up to date contact details can be found at

<https://www.gov.uk/government/publications/child-death-overview-panels-contacts>

Section 10 continues overleaf

10.Quick referral flowchart



Note: The concerns listed above are not exhaustive. Staff can and should also record and report other concerns about a student, such as general welfare concerns.

11. Deficiencies and weaknesses

It is the duty of all members of Staff and the proprietor to draw to the attentions of the DSL any weakness or deficiencies in this policy. The DSL will ensure that this is then followed up without delay, with policies and procedures being updated as needed rather than waiting for any regular review date.

12. Complaints

All complaints arising from the operation of this policy should be referred to the DSL (who will keep the Local Governing Body informed). If the complaint relates to the Principal who is also the DSL, this should be referred directly to the Governor with responsibility for Safeguarding who will arrange for the complaint to be investigated.

DRAFT

Appendix

(This additional document is related to The Child Protection Policy and encompasses the types of abuse and neglect signs which are identified in Keeping Students Safe in Education (September 2018))

Types and Signs of Abuse and Neglect including Possible Indicators

Types of Abuse and Neglect: Working Together to Safeguard Students (HM Government, 2015) defines abuse as a form of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another student or students. Working Together to Safeguard Students (HM Government, 2015) further states that the type of abuse and neglect include: Abuse and Neglect; Neglect; Physical abuse; Domestic Violence; Drug/alcohol abuse; Emotional abuse; Abuse of Trust; Sexual abuse; Students who sexually abuse; Student Sexual Exploitation; Student exploitation and E-safety; Female Genital Mutilation; Forced Marriages; Safeguarding Disabled Students; Disability and Vulnerability; Vulnerable Groups; Vulnerable Pupils; Students in Need; Students who run away or go missing and Significant Harm.

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

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

Sexual abuse and Student Sexual Exploitation (CSE): CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, drugs, alcohol, money or affection) as a result of engaging in sexual activities. CSE can range from 'consensual' to serious organised crime by gangs. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Sexual abuse involves forcing or enticing a student or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the student is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student in preparation for abuse (including via the internet). Some young people do not exhibit any external signs of abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other students.

Neglect: the persistent failure to meet a student's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a student 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 student from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a student's basic emotional needs.

Specific safeguarding issues: Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, NSPCC offers information for schools and Academies on the TES website and also on its own website www.nspcc.org.uk/preventingabuse/. Schools and Academies can also access broad government guidance on the issues listed here via the GOV.UK website: student sexual exploitation (CSE); bullying including cyberbullying; domestic violence; drugs; fabricated or induced illness; faith abuse; female genital mutilation (FGM); forced marriage; gangs and youth violence; gender-based violence against women and girls (VAWG); mental health; private fostering; radicalization; sexting; teenage relationship abuse; trafficking

Female Genital Mutilation (FGM): Here at Great Western Academy we are alert to the possibility of a girl being at risk of FGM, or already having suffered FGM and are aware of our mandatory reporting duties in this regard. There are a range of potential indicators that a student or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the student or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and students social care. Regulated professionals i.e. teachers, social workers and healthcare professionals have a duty under the Serious Crime Act (2015) to report any cases of FGM identified in a female under 18 years of age to the police via the non-emergency number: 101.

Indicators of Abuse

NEGLECT

The nature of neglect: Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors. Far more students are registered to the category of neglect on student protection plans than to the other categories. As with abuse, the number of students experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter; protect a student from physical and emotional harm or danger;
- ensure adequate supervision or stimulation or ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of students under 12:

- frequently going hungry; frequently having to go to school in dirty clothes;
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse; being abandoned or deserted; living at home in dangerous physical conditions;
- not being taken to the doctor when ill and not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: students who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group. Neglect is often noticed at a stage when it does not pose a risk to the student. The duty to safeguard and promote the welfare of students (What to do if you are worried a student is being abused 2006) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a student continuing to suffer until it reaches a point when they are at risk of harm

or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the designated person/student protection co-ordinator.

Indicators of neglect: The following is a summary of some of the indicators that may suggest a student is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a student is being abused. Each student should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect include:

- constant hunger and stealing food; poor personal hygiene – unkempt, dirty or smelly;
- being underweight; wearing dress unsuitable for weather; poor state of clothing;
- illness or injury untreated and looking sad, false smiles.

Behavioural indicators of neglect include:

- constant tiredness; frequent absence from school or lateness; missing medical appointments;
- becoming isolated among peers; being frequently unsupervised; stealing or scavenging, especially food and
- having destructive tendencies.

EMOTIONAL ABUSE

The nature of emotional abuse: Most harm is produced in low warmth, high criticism homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove. Emotional abuse is chronic and cumulative and has a long-term impact. All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Students can be harmed by witnessing someone harming another person – as in domestic violence. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their students, by the way that the adults are speaking to, or behaving towards students. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of Emotional Abuse

Developmental issues include:

- delays in physical, mental and emotional development; poor school performance and speech disorders, particularly sudden disorders or changes.

Behaviour:

- acceptance of punishment which appears excessive;
- over-reaction to mistakes; continual self-deprecation (I'm stupid, ugly, worthless etc.);
- neurotic behaviour (such as ricking, hair-twisting, thumb sucking); self-mutilation; suicide attempts;
- drug/solvent abuse; running away; compulsive stealing, scavenging;
- acting out; poor trust in significant adults; regressive behaviour – e.g. wetting;
- eating disorders; destructive tendencies; neurotic behaviour; arriving early at school, leaving late.

Social issues:

- withdrawal from physical contact or from social interaction; over-compliant behaviour or insecure, clinging behaviour; poor social relationships.

Emotional responses:

- extreme fear of new situations; inappropriate emotional responses to painful situations (“I deserve this”);
- fear of parents being contacted; self-disgust; low self-esteem; unusually fearful with adults;
- lack of concentration, restlessness, aimlessness; extremes of passivity or aggression.

PHYSICAL ABUSE

The nature of physical abuse:

Most students collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences e.g. shins. Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present. A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no student should be asked to remove clothing by a member of staff of the Academy.

- Indicators of physical Abuse/Factors that should increase concern:
- multiple bruising or bruises and scratches (especially on the head and face);
- clusters of bruises – e.g. fingertip bruising (caused by being grasped);
- bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- bruises on the back, chest, buttocks, or on the inside of the thighs;
- marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- bite marks;
- deliberate burning may also be indicated by the pattern of an instrument or object - e.g. electric fire, cooker, cigarette; scalds with upward splash marks or tide marks; untreated injuries;
- recurrent injuries, burns or bald patches;
- having broken bones or unexplained bruising, burns or welts in different stages of healing;
- being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.

In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury;
- the explanation uses words or phrases that do not match the vocabulary of the student (adults’ words);
- no explanation is forthcoming; the student (or the parent/carer) is secretive or evasive or
- the injury is accompanied by allegations of abuse or assault.

You should be concerned if the student or young person:

- is reluctant to have parents/carers contacted; runs away or shows fear of going home;
- is aggressive towards themselves or others; flinches when approached or touched;
- is reluctant to undress to change clothing for sport; wears long sleeves during hot weather;
- is unnaturally compliant in the presence of parents/carers; has a fear of medical help or attention

or

- admits to a punishment that appears excessive.

SEXUAL ABUSE

The nature of sexual abuse: Sexual abuse is often perpetrated by people who are known and trusted by the student – e.g. relatives, family friends, neighbours, babysitters, people working with the student in school, faith

settings, clubs or activities. Students can also be subject to Student Sexual Exploitation. Most people who sexually abuse students are men, but some women sexually abuse too.

Characteristics of student sexual abuse:

- it is often planned and systematic – people do not sexually abuse students by accident, through sexual abuse can be opportunistic;
- grooming the student – people who abuse students take care to choose a vulnerable student and often spend time making them dependent;
- grooming the student's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Indicators of sexual abuse:

Physical observations:

- damage to genitalia, anus or mouth; sexually transmitted diseases; unexpected pregnancy, especially in very young girls;
- soreness in genital area, anus or mouth and other medical problems such as chronic itching;
- unexplained recurrent urinary tract infections and discharges or abdominal pain.

Behavioural observations

- Sexual knowledge inappropriate for age; Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity; Hinting at sexual activity inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness; Socially isolated or withdrawn
- Overly-compliant behaviour; Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults; Regressive behaviour, Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour; Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures; Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed; Trying to be 'ultra-good' or perfect; overreacting to criticism