



THE BAY
LEARNING TRUST

Safeguarding and Child Protection Policy

The Bay Learning Trust
The Lodge
Ripley St Thomas
Ashton Road
Lancaster
LA1 4RR

t 01524 581872
e admin@baylearningtrust.com
website baylearningtrust.com

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Safeguarding and Child Protection Policy 2022 – 23

Key Contacts, Roles and Training			
Role	Name	Contact	Training
Trust Designated Safeguarding Lead Prevent Lead	Jamie Fox	jfox@carnforthhigh.co.uk	DSL Training September 2023 Safer Recruitment Training February 2023
Trust Designated Deputy Safeguarding Lead	Katie Benter	benterk@baylearningtrust.com	DSL Training September 2023 Prevent Training September 2022
CEO	Sally Kenyon		Safer Recruitment Training March 2022
Chair of Directors	John Crewdson		Safer Recruitment Training March 2023
Ripley St Thomas C of E Academy DSL	Katie Benter	benterk@baylearningtrust.com	
Carnforth High School DSL	Jamie Fox	jfox@carnforthhigh.co.uk	
Morecambe Bay Academy DSL	Delyth Roberts-Jones	droberts-jones@morecambebayacademy.co.uk	
Central Lancaster High School DSL	Victoria Crossman	vcrossman@lancasterhigh.lancs.sch.uk	
Longridge High School DSL	Kieren Sutcliffe	KIS@lhs.lancs.sch.uk	

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1. Context and Rationale

The Bay Learning Trust is committed to providing:

- A safe space for children to learn and grown in order to achieve their aspirations
- A safe space for staff, so that all staff can flourish in a supportive environment
- A safe space for children to talk about their worries and problems

The Bay Learning Trust fully recognises the contribution we can make to protect children from harm and to support and promote the welfare of all children who are pupils at our schools. This policy applies to all stakeholders; this includes pupils, staff, parents, governors, directors, volunteers, placement students and visitors.

This policy will give clear direction to all stakeholders about expectations and our legal and moral responsibility to safeguard and promote the welfare of all children at our schools. The Bay Learning Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. We recognise that **no single professional can have a full picture** of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the Trust, Trust board, school governing bodies, the Executive Headteacher/Headteacher, DSLs, Deputy DSLs, staff and all stakeholders understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL. In addition, to ensure that staff are aware that ANYONE can make a referral.
- Establishing a safe environment in which children can learn and thrive.
- Raising pupil awareness of child on child abuse and providing pupils with knowledge about reporting systems.
- Including appropriate opportunities within the curriculum for pupils to develop the skills to recognise abuse and to stay safe.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Endeavour to provide a safe and welcoming environment where children are respected and valued; where the voice of the child is listened to and is paramount.
- Where it is believed that a child is at risk of or is suffering significant harm, the Trust will follow the procedures set out by our local Safeguarding Children Partnership arrangements.

https://panlancashirescb.proceduresonline.com/chapters/contents.html#ind_cases

2. Definitions

The terms “**children**” and “**child**” refer to anyone under the age of 18. We can identify a pupil (anyone over the age of 18) at risk.

The purpose of this safeguarding policy is to ensure every pupil learning within The Bay Learning Trust is safe and protected from harm. The Department for Education (DfE) ‘Keeping Children Safe in Education’ (September 2023), states safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

Children can abuse other children. This is generally referred to as **child on child abuse** and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

“**Consent**” is a fundamental part of understanding sexual harassment and violence. We want to be clear here what consent is so it may be understood whether sexual harassment or violence has taken place. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. In addition, you may wish to participate in some conversations but not those of a sexual or sexualised nature.

Consent can be withdrawn at any time. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.

It is important to highlight here that the law governs when someone can give consent. You are deemed able to give consent only from the age of 16.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a

sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. **Sexual harassment can include, but is not limited to:**

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
 - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
 - Sharing unwanted explicit content.
 - Upskirting.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including on social media.
 - Sexual exploitation, coercion, and threats.

Upskirting refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

Consensual and non-consensual sharing of nude and semi-nude images and/or videos, colloquially known as "**sexting**" and "**youth produced imagery**", is defined as the sharing between pupils of sexually explicit content, including indecent imagery.

Indecent imagery is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

Consent is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

3. Law and Guidance

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to:

- **Education Act 2002:** Section 157 of the same act and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies) to have arrangements to safeguard and promote the welfare of children.

- **Education Act 1996:**
- **Working Together to Safeguard Children 2018** guides education establishments of their role within inter-agency working to safeguard and promote the welfare of children. This is **the government's statutory guidance for all organisations and agencies** who work with, or carry out work related to, children in the United Kingdom.
- **Keeping Children Safe in Education 2023 (and as amended)**: The Department for Education (DfE) has updated the statutory safeguarding and child protection guidance for schools and colleges in England, Keeping children safe in education. This guidance sets out what schools and colleges in England must do to safeguard and promote the welfare of children and young people under the age of 18.
- **Sexual Violence and Sexual Harassment Between Children in Schools and Colleges: Department for Education, September 2021**
- **Childcare Act 2006**
- **Counter Terrorism and Security Act 2015 together with the Revised Prevent Duty Guidance for England and Wales (2015)**
- **Guidance for Safer Working Practice (with Addendum April 2020)**
- **The Children Act 1989 & 2004**
- **The Prevent Duty** – The Prevent duty is **the duty in the Counter-Terrorism and Security Act 2015** that sets out guidance for the LA and its partners to have due regard to the need to prevent people from being drawn into terrorism.
- **FGM** as set out in the Female Genital Mutilation Act 2003 (“the 2003 Act”), as amended by the Serious Crime Act 2015.

Relevant Non-statutory guidance

- DfE (2015) ‘What to do if you’re worried a child is being abused’
- DfE (2018) ‘Information sharing’
- DfE (2017) ‘Child sexual exploitation’
- DfE (2021) ‘Recruit teachers from overseas’
- DfE (2020) ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’

This policy operates in conjunction with the following [school policies](#):

- Anti-Bullying Policy
- RSE and Health Policy
- Online Safety Policy
- Online Safety Acceptable Use Policy
- Mobile Devices Policy
- Behaviour for Learning Policy
- Relationship and Sex Education Policy
- Confiscation and Search Policy
- Care and Control Policy

And the following [Trust policies](#):

- Data Protection Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Staff Code of Conduct
- Managing Allegations of Abuse Made Against Staff Policy

4. Roles and responsibilities

All staff have a responsibility to:

- Have read and understood part one of the DfE's Keeping Children Safe in Education (as amended from time to time).
- Behave in accordance with the Trust's Staff Code of Conduct.
- Consider, at all times, what is in the best interests of the pupil with a **child-centred approach**
- Contribute to, and maintain a **high safeguarding ethos** within the setting, with safeguarding pupils at the forefront of practice at all times
- Ensure ALL children have opportunities to communicate and know that they are **listened to**
- Contribute to **providing a curriculum** which will equip children with the skills to keep themselves safe and develop an attitude which will enable them to enter adulthood successfully and reach their full potential
- Establish effective, supportive, and **positive relationships** with parents, carers, pupils and other professionals
- Maintain an attitude of '**it could happen here**' where safeguarding is concerned
- Be proactive to provide a **safe environment** in which pupils can learn
- Be prepared to **identify** pupils or families who may benefit from **early help**
- Be aware of the **school's individual procedures** that support safeguarding, including all policies, internal reporting procedures, information and training provided
- Be aware of the role and **identity of the DSL** and deputy DSLs and seek them for advice if required
- Undertake **safeguarding training**, including online safety training, during induction and subsequently on a regular basis, including receiving bulletins, emails and briefings
- Be aware of the **local early help process** and understand their role in it.
- Be aware of, and understand, the process for making referrals to Children's Social Care, understanding that **anyone can make a referral**
- Understand how to make a referral to CSC and/or the police immediately, if at any point there is a **risk of immediate serious harm to a child**
- Be aware of and **understand the procedure to follow** in the event that a child confides they are being abused, exploited or neglected, in a timely manner
- Maintain appropriate **levels of confidentiality** when dealing with individual cases
- **Reassure victims** that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Be aware of **safeguarding issues** that can put pupils at risk of harm.
- Be aware of their own statutory duty to inform the police of any reported incident of FGM along with reporting it to the DSL or a member of his/her team.
- **Be aware of behaviours linked to issues** such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.
- Be fully aware of the importance of **mental health in relation to safeguarding** and that all staff should also be aware that mental health problems can, in some cases, be an

indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Teachers, including the Executive Headteacher/Headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the '**Teachers' Standards**'.

Governing bodies have a duty to:

- Take **strategic leadership responsibility** for the school's safeguarding arrangements.
- Ensure all members of the Governing Body undertake safeguarding training provided by the Bay Learning Trust, in conjunction with the Lancashire Schools' Safeguarding Officers, to be able to challenge staff and ensure that appropriate safeguarding measures in place (including the development and adoption of a Child Protection Policy).
- Ensure that the school **complies with its duties** under the above child protection and safeguarding legislation.
- Ensure that staff working directly with children **read and understand** at least Part one of KCSIE.
- Ensure a **named Governor takes leadership responsibility** for safeguarding arrangements.
- Appoint a member of staff from the SLT to the **role of DSL** and one or more deputy DSLs to provide support, and ensure that they are trained to the same standard as the DSL and that the roles are explicit in their job description(s). Ensure the provision of appropriate support, funding, training, resources, and time to carry out their role.
- Facilitate and support a **whole-school approach to safeguarding**; this includes ensuring that safeguarding and child protection are at the forefront and **ethos** remains consistently high
- Ensure **systems are in place so that children are able to confidently report abuse**, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible. Ensure that the **voice of the child** is heard and acted upon.
- Ensure **effective and appropriate policies** and procedures are in place for reporting and dealing with allegations against employees and volunteers that complies with guidance from the Local Authority and the locally agreed inter-agency procedures.
- Make sure that **pupils are taught about safeguarding**, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- Adhere to statutory responsibilities by conducting **pre-employment checks on staff** who work with children
- Ensure the school has **clear systems and processes in place for identifying possible mental health problems in pupils**, including clear routes to escalate concerns and clear referral and accountability systems
- Make sure that at least one person on any recruitment panel has undertaken **safer recruitment training**
- Ensure that **all staff receive safeguarding and child protection training** updates, e.g. emails, as required, but at least annually, including a thorough induction
- Confirm that there are transparent procedures in place to handle **allegations against staff**, supply staff, volunteers and contractors
- Confirm that there are **procedures in place to make a referral to the DBS** and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned
- Ensure that appropriate disciplinary procedures are in place, as well as **policies**

pertaining to the behaviour of pupils and staff

- Ensure that **procedures are in place to eliminate unlawful discrimination**, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Appoint a **designated teacher to promote the educational achievement of CLA** and ensure that this person has undergone appropriate training
- Ensure that the **appropriate level of check** is completed on Governors
- Create a culture where **staff are confident to challenge** senior leaders over any safeguarding concerns
- Ensure that **children are safe online** by ensuring that appropriate filters and monitoring systems are in place. [See Online Safety Policy](#)
- Ensure that **safeguarding is embedded within the curriculum**
- Ensure staff in school are aware of, and policies are personalised to reflect, an understanding of specific issues such as **child on child abuse** and safeguarding children with disabilities and special educational needs
- Ensure that all practice and procedures operate with the best interests of the child at the centre with a **firm child centred approach**.
- Ensure that the Trust is aware of its duties regarding PREVENT/Channel (early multi-agency intervention process) referrals in conjunction with the police and the Local Authority, in particular that the Trust has “due regard to the need to prevent people from being drawn into terrorism”. All employees understand that they have a statutory duty to notify a member of the Safeguarding Team should they have a concern.
- Ensure that all employees are aware of their statutory duty to report Female Genital Mutilation (“FGM”) to a member of their Safeguarding Team and the Police.

The named Governor for safeguarding is responsible for:

- Maintaining regular contact with the Trust’s DSL.
- Maintaining awareness of current responsibilities and requirements in relation to child protection by attending appropriate professional development activities and keeping updated on guidance and statutory publications from the DfE and HM Government.
- Liaising with the local authority in the event of allegations of abuse being made against the Executive Headteacher/Headteacher.
- Ensuring that this policy is effective and that local child protection guidelines set local safeguarding partners are complied with.

The Executive Headteacher/Headteacher will ensure that:

- The policies and procedures adopted by the Governors are fully implemented and followed by all employees.
- Sufficient resources and time are allocated to enable the DSL and other employees to discharge their responsibilities effectively.
- All employees and volunteers feel able to raise concerns about poor or unsafe practice with regards to children and such concerns are addressed sensitively and effectively in accordance with the Trust’s whistleblowing policies.

The DSL at The Bay Learning Trust is Jamie Fox.



Mr Fox

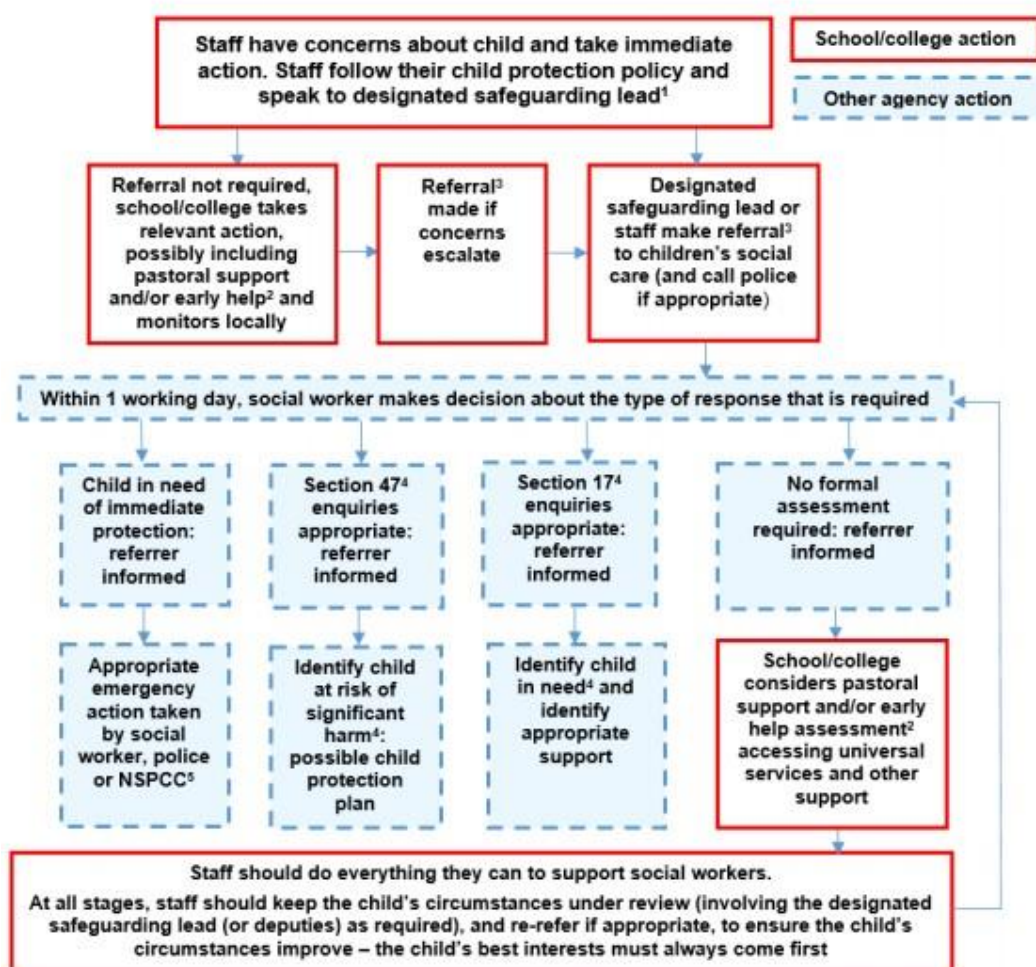
Jamie Fox's duties are to:

- Take **lead responsibility for safeguarding** and child protection, including online safety, creating and maintaining a highly visible safeguarding culture.
- Work alongside the Online Safety Officers to ensure that pupils, staff, parents and governors are educated in appropriate online safety measures.
- Understand the filtering and monitoring systems in place.
- Provide **advice, support and expertise to other staff** on child welfare, safeguarding and child protection matters.
- Ensure that there are mechanisms in place to ensure that employees and Governors are aware of, understand and can discharge their role and responsibilities under this policy.
- **Take part in strategy discussions**, inter-agency meetings and Child Protection Conferences and/or support other Trust staff to do so.
- **Contribute to the** assessment of children, and/or support other staff to do so.
- **Ensure and support DSLs to** refer cases:
 - To CSC where abuse and neglect are suspected, and support staff who make referrals to CSC
 - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme
 - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance
 - And to any other appropriate identified agency or partner.
- Act as a **point of contact** with the multi-agency partners
- Ensure **effective communication** and information sharing (when appropriate) between DSLs, Governors, Executive Headteacher/Headteachers, Directors, CEO, Executive Leadership Team.
- Provide guidance to DSLs and relevant staff when deciding whether to make a referral by **liaising with relevant agencies** so that children's needs are considered holistically.
- Provide guidance to **school mental health leads**, where safeguarding concerns are linked to mental health.
- Promote **supportive engagement with parents** in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with relevant staff to support DSLs **to take lead responsibility for promoting educational outcomes** for children, by understanding the lasting impact that adversity and trauma can have on children's behaviour, mental health and wellbeing, knowing the safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
 - Ensuring that the school knows which pupils have or had a social worker
 - Understanding the academic progress and attainment of these pupils

- Maintaining a culture of high aspirations for these pupils
 - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential
-
- Ensure that **child protection files (including referrals) are kept updated** and secure, monitoring the quality and accuracy of logs.
 - Ensure that child protection files, particularly special categories of information, is shared and stored in compliance with data protection legislation (including the UK GDPR and the Data Protection Act 2018).
 - Ensure that a pupil's child protection **file is transferred** as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared to support a child's journey.
 - Ensure **all stakeholders understand the Safeguarding and Child Protection Policy**, Keeping Children Safe in Education 2023 and internal procedures to report any concerns are transparent and understood by all. Ensure this information is given to staff as part of their **induction** and at regular intervals.
 - Ensure that CPOMS is used effectively by all Trust staff and provide an alternative method of written record so that staff and visitors who do not have CPOMS access are able to report and record a Child Protection concern.
 - Work with the Trust Governance Professional to ensure that regular safeguarding training is provided
 - Work with the Trust Governance Professional to ensure that each school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly, including a detailed overview of the KCSIE 2023 document and to be available to support all members of the governing body with any questions related to safeguarding
 - Ensure that each school's **Safeguarding and Child Protection Policy is available publicly** and that parents are made aware of its contents in order that they are aware of the circumstances in which referrals about suspected abuse or neglect may be made and the role of the Trust.
 - Work with DSLs to ensure that schools inform parents regarding the delivery of sensitive elements of the curriculum that have a safeguarding focus, so that pupils can be supported at home where needed.
 - Undergo **DSL training**, and update this training at least every two years to remain compliant, ensuring all DSLs and Deputy DSLs within the Trust complete this training.
 - Attend child sexual exploitation training.
 - Ensure opportunities for **further training** and opportunities for upskilling are taken, utilising resources from the NSPCC, amongst others.
 - Encourage a culture of listening to children promoting **the voice of the child**. This is done via pupil voice meetings and surveys, and during informal discussions.
 - **Recognise the importance of information sharing**, including within schools, with other schools and with the safeguarding partners and other agencies by understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
 - Undertake **Prevent** awareness training, and ensure all other staff take Prevent awareness training as appropriate.
 - Be provided with appropriate support and **supervision** in order to carry out the role safely and effectively.
 - To ensure that there is always appropriate cover in place for his role as and when required.
 - Co-ordinate all activities relating to child protection and children in care, including record keeping, the Trust's representation at child protection conferences and other related meetings, supporting pupils at risk, liaison with other professionals, and the monitoring of welfare and academic progress.

- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Support DSLs to liaise with the Local Authority Personal Advisors for any Care Leavers.

Actions where there are concerns about a child



5. Training and Induction

The Bay Learning Trust recognises the importance of ongoing staff training and development to keep staff aware of emerging issues and keeping the ethos of safeguarding high. Everybody has a role to play in safeguarding our children and we strive to ensure all staff are well informed and know what to do if they have any concerns. Staff members will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover: The Child Protection and Safeguarding Policy

- The Child-on-Child Abuse and procedures.
- The Staff Code of Conduct
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy (for school-based staff).
- The Attendance Policy, including the safeguarding response to children who go missing from education (for school-based staff).
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSL(s)

- How to record concerns in your setting.
- Pastoral Systems.

Records are kept of all inductions and Safeguarding training.

Following induction, recognises the need to ensure continual, effective training to staff and other stakeholders. We ensure:

- ALL staff and volunteers will receive Safeguarding Training (at least) annually
- The DSL/s will provide ALL staff, volunteers, directors and governors with regular safeguarding updates
- ALL staff, volunteers, directors and governors will read and show an understanding of any updates that are provided
- DSLs will attend DSL training every 2 years and update their knowledge, skills and understanding of relevant safeguarding issues on a regular basis
- The DSL will undertake Prevent awareness training
- At least three members of SLT and two governors of each Trust school will attend Safer Recruitment Training. This will be renewed at least every 5 years
- ALL staff, volunteers, directors and governors will undertake any additional specialised training on matters such as Sexual Violence and Harassment, Child Sexual Exploitation, Prevent, Child on Child abuse, Online Safety, FGM, Coercive Control etc. as is deemed necessary by the DSL and that is particularly relevant to the context and needs of the setting
- Any staff member will discuss any specific training requirements or gaps in knowledge or understanding with the DSL/s
- School-based staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school
- Detailed records will be held of staff safeguarding training and ensure that no training becomes out of date.

6. Multi-Agency Working

The Trust has a pivotal role to play in multi-agency safeguarding arrangements. The Trust contributes to multi-agency working as part of its statutory duty. The Trust is aware of and will follow the local safeguarding arrangements to promote the welfare of children in its care. Further details on www.lancashiresafeguarding.org.uk

The Trust will be fully engaged, involved, and share information with local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.

The Trust will take a multi-agency approach in safeguarding to provide a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

The Trust will work with Children & Family Wellbeing Team, Children's Social Care (CSC), the Police, Health services and other relevant partners and agencies for the benefit of families and children ensuring contribution to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSC from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The Trust also recognises the particular importance of inter-agency working in identifying

and preventing Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).

Information sharing

The Trust recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

When relying on the lawful conditions for processing special categories of personal data such as health, sex life and racial ethnicity under the substantial public interest part of the Data Protection Act's Schedule 1, the Trust will ensure that:

- the information shared is necessary for the practitioners involved to properly participate in the protection and safeguarding of the individual concerned;
- it will be shared by secure means of communication to protect the rights of the individual;
- the information shared will not be excessive and will be kept to that which is relevant for the practitioners and organisations involved in the matter; and
- the records of information shared with the Trust will be retained in accordance with advice issued by the Department for Education from time to time.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the school's DSL or deputy DSL(s).

7. Early help

The Trust's aim is to identify and pupils or families who could benefit from further support at the earliest stage possible. Early help means providing support as soon as the need emerges, at any point in a child's life. This support may involve sign posting/referring/information sharing with the appropriate agencies already with families as well as offering support from the Trust's pastoral team.

The Trust's monitors pupils to ensure that it can identify emerging trends that may indicate safeguarding issues for Care/Police/PREVENT panels to take decisions about individual pupils.

The Trust will listen and take seriously any disclosure or allegation of abuse and any concern expressed about the safety and wellbeing of pupils.

The Bay Learning Trust recognises that any professional can provide early help. Each pupil is supported by their progress/ form/ class teacher. Relevant leaders will have oversight on the needs of all pupils in their care. Regular discussions with the DSL and DDSL helps identify pupils who need early help by identifying them on an intervention scale of 1 to 3. Strategies are then used appropriately to support the pupils' needs. Any pupil or family may benefit from early help, but staff will be alert to the potential need specifically for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs
- Have SEND, regardless of whether they have a statutory EHC plan
- Have mental health needs

- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Are frequently missing or going missing from care or from home
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Are at risk of being radicalised
- Is misusing drugs or alcohol
- Have family members in prison, or are affected by parental offending
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
- Misuse drugs or alcohol.
- Have returned home to their family from care
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day
- Show any other early signs of abuse, neglect any other identified reason not listed above that requires extra support or intervention to improve outcomes for families and children.

DSLs, will take the lead where early help is appropriate and consent has been gained. They will be supported by SLT and other members of the Pastoral Team in doing this. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required to help provide the right, effective support at the right time.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review assessing the impact of the support.

We therefore ensure that:

- All staff and volunteers can identify the risk factors that indicate a family or pupil may benefit from Early Help and can follow school procedures to share this with the DSL
- DSLs and other members of the Pastoral Team, will undertake a Family Early Help Assessment, when appropriate, to identify what Early Help is required
- DSLs will signpost and refer to appropriate support agencies
- DSLs and Pastoral Leaders will lead on TAF meetings where it is appropriate for them to do so
- DSLs will follow the local safeguarding processes and refer to Children's Social Care where Early Help has not been successful in reducing risk and meeting unmet needs using [Lancashire Continuum of Need and Thresholds Guidance](#)

8. Abuse and neglect

Abuse is defined as a form of maltreatment of a child which involves a person inflicting harm or 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. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

Physical abuse is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise

causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child. Staff are aware of Female Genital Mutilation, a form of Physical abuse.

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

Sexual abuse is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age. Sexual abuse can also 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. The sexual abuse of children by other children is a specific safeguarding issue which all staff must be aware of.

Neglect is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- All staff will be aware of the indicators of abuse and neglect and be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with contextual factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms.)
- All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, radicalisation and the sharing of indecent images.
- ALL staff understand that children who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported - Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment.
- ALL staff are trained to notice changes in the behaviours of our pupils that may be an indicator that they are suffering from abuse.

- ALL staff know that if they are worried about the safety of a child and cannot contact the DSL or DDSL, they are encouraged to phone CSC directly and report their concerns.
- ALL staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues, reporting any concerns, in the appropriate manner to the DSL. This can be done verbally, supported by a written account, or via CPOMS.

9. Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. In line with the Domestic Abuse Act 2021, **domestic abuse** is defined as abusive behaviour of a person towards another person where both are aged 16 or over and are personally connected. **Abusive behaviour** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

The school will recognise the serious, long lasting emotional impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

The Bay Learning Trust has commitment to Operation Encompass and informing all stakeholders of the initiative. The lead person for Operation Encompass is Mr Jamie Fox, Trust DSL. All DSLs and DDSLs are also in receipt of Operation Encompass notifications.

10. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy DSLs are aware of the contact details and referral routes into the Local Housing Authority so that concerns and support over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because "they have to" or frequent moves.

Referrals to the Local Housing Authority do not replace referrals to CSC where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSC will be made as necessary where concerns are raised.

11. Children missing from education

Staff will be aware a child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation. Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Attendance Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Where reasonably possible schools and colleges **will hold more than one emergency contact number for their pupils and students.**

12. Child criminal exploitation (CCE)

Child criminal exploitation is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence (this could be online or through technology)

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The Trust will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of **any gender** are at risk of CCE.

Trust staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Appearing with unexplained gifts, money or new possessions.

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered in addition to normal safeguarding procedures.

As well as the general indicators for CCE, staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line, moving drugs, collecting money
- Being found in accommodation they have no connection
- Owing a 'debt bond' to their exploiters
- Having their bank account used to facilitate drug dealing.

13. Child sexual exploitation (CSE)

Child sexual exploitation is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence, this could be online or through technology.

The Trust recognises that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The Trust will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The Trust will also recognise that pupils may not realise they are being exploited and they believe they are in a genuine romantic relationship.

Trust staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered.

14. Modern slavery

Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism. (From The Modern Slavery Act 2015, Section 52) The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking':

15. FGM

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

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSC and/or the police. The Trust's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section

74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Staff failing to report such cases may face disciplinary action. Staff will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the staff member has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSC as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society
- The pupil coming from a community known to adopt FGM
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE
- Travel abroad or a long holiday with relatives to a country known to practise FSM.

FGM is included in the definition of **'honour-based' abuse (HBA)** which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

16. Forced marriage

Forced marriage occurs when a young person is forced into a marriage they do not want with someone they have not chosen, following violence, threats, any other form of coercion or possibly physical or sexual abuse. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

It is very different from an arranged marriage where both young people can make the decision to accept or decline the partner chosen for them by their parents.

Schools can be seen as being in the front line in protecting young people from this type of abuse. A pupil who fears that they are likely to be forced into a marriage may disclose it to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear, that the proposed holiday will result in a forced marriage, may only become apparent after a number of conversations. Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced Marriage Unit Unit (fmu@fcdof.gov.uk) who provide support to professionals dealing with forced marriage cases and individuals at risk or subject to forced marriage.

17. Honour based violence (“HBV”)

Murder or violence in the name of so-called honour’ are murders/violence in which, predominantly females, are killed/harmed for actual or perceived immoral behaviour, which is deemed to have breached the honour code of a family or community, causing shame. They are sometimes called ‘honour killings/violence’. There is, however, no honour in murder/violence.

The honour code may allege (incorrectly) that women must follow rules that are set at the discretion of male relatives and which are interpreted according to what each male family member considers acceptable. Breaking the rules is seen as destroying the good name of the family, and is deserving of punishment at the discretion of male relatives.

Honour is an unwritten code of conduct that involves loss of face on someone’s part if offended against, especially in groups where loyalty is considered paramount. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

Signs:

- withdrawal of student from the school by those with parental responsibility;
- pupil being prevented from attending higher education;
- truancy or persistent absences;
- request for extended leave or pupil not returning from an overseas visit;
- surveillance by siblings/cousins/extended family members at the school;
- decline in behaviour, engagement, performance or punctuality, poor exam results. – in particular for previously motivated pupil; or
- decline in physical presentation or demeanour.

18. Extremism & Radicalisation

Extremism refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

Protecting pupils from the risk of radicalisation is part of the Trust’s wider safeguarding duties. The Trust will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The Trust will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, each school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil’s parents, unless the school has reason to

believe that the child would be placed at risk as a result.

The Trust DSL and all school DSLs will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. DSLs will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation. The school works closely with

the Lancashire Prevent Partnership to provide up to date training for the DSL, deputies and members of SLT. All staff also undertake online Prevent training as standard.

- The Online Safety Policy will ensure the safety of children by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering software is in place
- DSLs understand when it is appropriate to make a referral to the Channel Panel and are aware of how to do so.
-

The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”, known as **the Prevent duty**, forming part of the school’s wider safeguarding obligations.

The Trust’s procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outlined in the Prevent Duty Policy.

The Bay Learning Trust will ensure that ALL Staff, Governors, Directors and volunteers are informed and have ‘due regard to the need to prevent people from being drawn into terrorism’, known as the ‘Prevent Duty.’

Trust Prevent Lead	Mr J Fox
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19. Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

20. Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of [‘Are you a young person with a family member in prison?’](#) from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

21. Child on child abuse including sexualised abuse

Child on child abuse is defined as abuse between children. The Bay Learning Trust has a zero-tolerance approach to abuse, including child on child abuse.

The Bay Learning Trust will refer to specific guidance in Keeping Children Safe in Education Part five: Child on Child Sexual Violence and Sexual Harassment and Lancashire Procedures. [5.31 Peer Abuse \(proceduresonline.com\)](#)

All staff will be aware that child on child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. Staff must recognise that sexual violence and harassment may occur between two children of any age and sex. All staff will be aware of the indicators of child on child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child on child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child on child abuse.

All staff will understand the importance to challenge inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Child on child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting.
- Initiation and hazing-type violence and rituals, which can 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.

All staff will be clear as to the school’s policy and procedures regarding child on child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school’s response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school’s procedures for managing allegations of child on child abuse are outlined in each School’s Behaviour for Learning Policy.

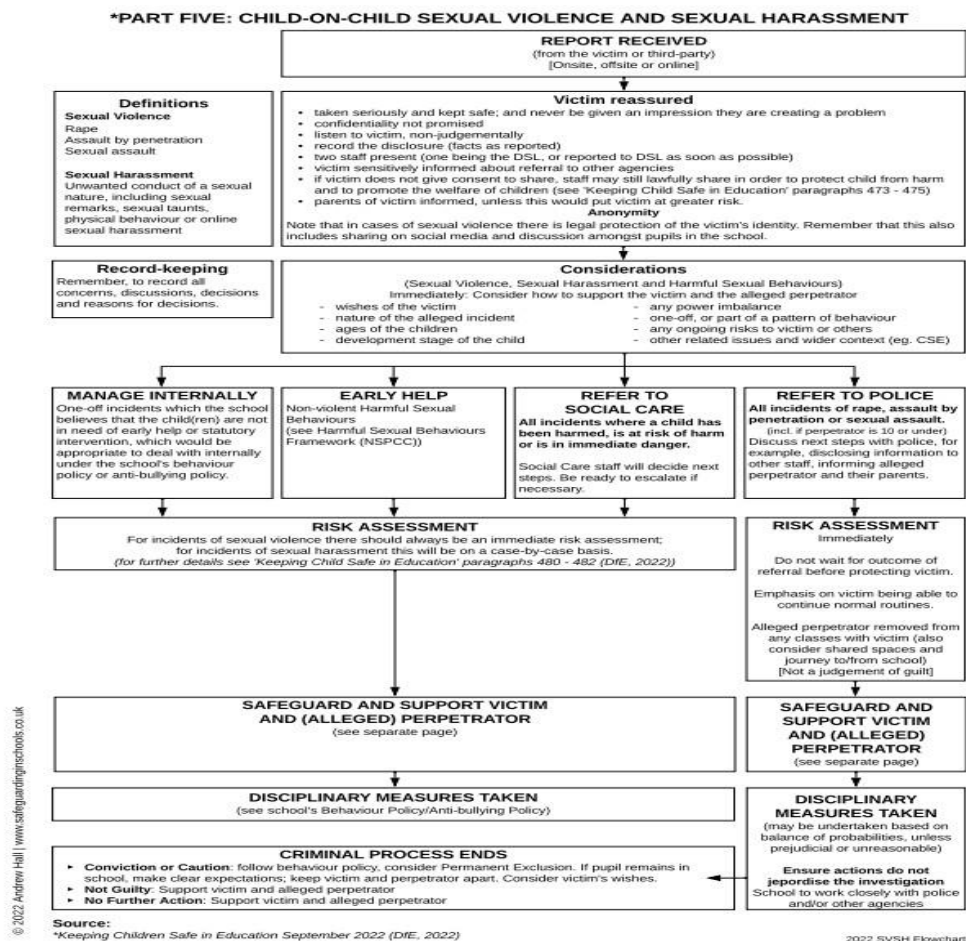
Considerations include:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident

- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school or college staff
- contextual safeguarding issues.
- **Following a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs assessment, considering:**
 - the victim
 - the alleged perpetrator
 - all other children (and if appropriate adult students and staff).
 - Risk assessments will be recorded and kept under review as a minimum termly.

Examples of risk Assessments and Guidance below:

Lancashire Education Lancashire Risk Risk Management Plan



22. Trans pupils and gender identity

Children may at any time question their gender identify or express that they are not the sex biologically assigned to them.

At all times the pupil's wishes and feelings must be heard and respected. We will work with the pupil and their family to support them on their journey and to put in place a bespoke package which allows them to take appropriate steps forward.

Pupils may be in a vulnerable state as they try to navigate their feelings. It is also important to understand that parents and family may also struggle to come to terms with the wishes and intentions of their children.

The Bay Learning Trust will endeavour to support families during this time, but the welfare and safety of the pupil will always come first.

Advice and assistance will be provided and sign posted to organisations such as Mermaids and Out on the Bay.

In addition to caring for the welfare of pupils we will ensure that the legal rights of pupils are observed under the Equality Act 2010 and associated legislation.

23. Other vulnerable pupils

Members of the Safeguarding Teams are often aware of pupils who are vulnerable for other reasons.

It is the Safeguarding Teams' responsibility to ensure that these pupils receive support either from a member of staff to whom the pupil relates or from an external agency. Relevant school SLT will be informed of the situation. This situation might be a temporary one or may be on-going. This also includes any vulnerable pupils who may be 18 and over in Trust sixth form provision. Parents/carers are informed of the situation wherever appropriate.

24. Honour based violence lesbian, gay, bisexual and transgender (LGBT)

The Bay Learning Trust believes that respect is a fundamental right and responsibility for all. It is the duty of all employees to ensure that every member of the school community feels valued, irrespective of their sexual/gender orientation, race or religion.

Diversity is celebrated and valued at The Bay Learning Trust and staff and pupils are embracing the journey towards Stonewall accreditation.

25. Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

26. Online safety and personal electronic devices

The Bay Learning Trust adhere to the Online Safety Policy at all times and is committed to keeping children safe online.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

The Trust will ensure that suitable filtering systems are in place on ICT equipment to prevent children accessing inappropriate material. This system will be monitored and reviewed with any inappropriate behaviours or searches being followed up appropriately.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

- When school become aware of an online safety issue that has occurred outside of school, it is managed in accordance with the school Online Safety Policy

Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Mobile Devices Policy.

Where photographs and videos will involve pupils who are CLA, adopted pupils, or pupils for whom there are security concerns, the Executive Headteacher/Headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are CLA or who have been

adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures. The Bay Learning Trust is committed to keeping pupils safe by ensuring that electronic devices such as cameras, phones and tablets are used in an appropriate manner.

Schools will therefore ensure that:

- parental consent is obtained to take and use photographs and/or videos of children, for use in school, to market the school or to share on social media / internet
- staff, visitors, volunteers and students do not use their own mobile phones or devices to take or record any images of children.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

27. Sexting and the sharing of indecent images

Sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. (UKCCIS, 2016), It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. 'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.

The Trust will ensure that staff are aware to treat the sharing of indecent images, including through sexting, as a safeguarding concern and a potential incident of child-on-child abuse.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sexting in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of sexting.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sexting that involves indecent images of a pupil, they will refer this to the DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copy, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Discuss this decision with the Executive Headteacher/Headteacher, Online Safety Officer or member of the SLT.
- Ensure the image is, where possible, viewed by someone of the same sex as the individual depicted.
- Ensure viewing takes place on school premises and with another member of staff present in the room – this staff member does not need to view the imagery.
- Record how and why the decision was made to view the imagery in accordance with the Records Management Policy.

Where the incident is categorised as ‘aggravated’, the situation will be managed in line with the school’s Peer-on-Peer Abuse Policy. Where the incident is categorised as ‘experimental’, the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL escalates the incident to CSC.

Where indecent imagery of a pupil has been shared publicly, the DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

28. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils’ behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSC or external agencies.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Pupils with SEND or disabilities are nearly 4 times more likely to be a victim of abuse
- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

29. Co-curricular activities and clubs

Co-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the schools to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running co-curricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSC or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

30. Alternative provision

Schools will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

31. Work experience

When a pupil is sent on work experience, schools will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

32. Managing referrals

All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSC or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

Schools will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate, schools will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSC decide that a statutory investigation is not appropriate and the school agrees with this decision, schools will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. Schools will work closely with parents to ensure that the pupil, as well as their family, understand the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

33. Concerns about staff and safeguarding practices

If a staff member has concerns about another member of staff (including supply staff and volunteers), it will be raised with the Executive Headteacher/Headteacher. If the concern is with regards to the Executive Headteacher/Headteacher, it will be referred to the chair of governors.

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

34. Allegations of abuse against staff

There are clear policies in line with those from the CSAP (Children's Safeguarding Assurance Partnership) for dealing with allegations against people who work with children.

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the Trust's Managing Allegations of Abuse Made Against Staff Policy. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-

level concerns". Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child, or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they 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.

All Trust staff are aware of these procedures and aware of the following expectations and protocol:

- ALL school staff and volunteers are aware that they must refer allegations or concerns around staff (including supply staff) conduct to the Executive Headteacher/Headteacher
- ALL central team staff and volunteers are aware that they must refer allegations or concerns around staff (including supply staff) conduct to the CEO
- ALL school staff and volunteers are aware of the requirement to, and process of referring allegations or concerns around the Executive Headteacher/Headteacher to the Chair of Governors and how to contact them
- ALL central team staff and volunteers are aware of the requirement to, and process of referring allegations or concerns around the CEO to the Chair of Directors.
- The Executive Headteacher/Headteacher/CEO and/or Chair of Governors/Directors will discuss the allegation with the Local Authority Designated Officer (LADO)
- CSAP procedures for dealing with allegations against staff will be followed http://panlancashirescb.proceduresonline.com/chapters/p_allegations.html
- ALL staff and volunteers remember that the welfare of the child is paramount and that they have a duty to inform the Executive Headteacher/Headteacher/CEO if any adult's conduct gives cause for concern
- All staff recognise the importance of sharing and reporting low-level concerns surrounding staff or any adult in a position of trust to the Executive Headteacher/Headteacher/CEO.
- ALL staff are aware of the Trust's Whistle Blowing Policy which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place
- Staff are fully aware of the Staff/Governors/Directors Code of conduct and are aware of professional expectations of their own behaviour and conduct.

The Bay Learning Trust recognises that children may make disclosures against someone who is in a position of trust not in the school setting. This may be an adult in a place of worship, a sports coach or a club leader. After ensuring that the child is safe, we recognise that we must refer to the LADO and share information.

35. Low level concerns

The Trust will foster a culture in which all concerns about employees are shared responsibly and with the right person. Our Trust recognises that there may be times when there are concerns about a professional's behaviour which do not meet the harm threshold. This includes third party staff and volunteers. Concerns such as this may arise in several ways and from a number of sources. Examples of this may be:

- suspicion, complaint or disclosure made by a child, parent or other adult within or outside of our Trust; or
- as a result of vetting checks undertaken during recruitment

Our Trust promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school are dealt with promptly and appropriately. Creating this culture in which all concerns are shared responsibly, in a timely way with the right person, and are recorded and dealt with appropriately is critical to effective safeguarding practice. This culture enables the school to identify concerning, problematic or inappropriate behaviour at the earliest possible stage, minimises the risk of abuse and ensures that all adults working in or on behalf of the Trust are clear about professional boundaries and act within these, in accordance with our ethos and values. This culture also empowers individuals to share concerns with key staff about their own behaviour at the earliest possible opportunity. The Trust will:

- ensure that employees 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;
- empower employees to share any low-level concerns with the DSL and to help all employees to interpret the sharing of such concerns as a neutral act;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with, or referred to, the LADO;
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weaknesses in the Trust's safeguarding system.

Within the Trust there is a commitment from leadership to adhere to, enforce and reinforce the Code of Conduct and its expectations, and to address any attempt to bypass policies or procedures – regardless of the person in question's status. All employees are briefed on the Code of Conduct and this policy so that everyone is familiar with it and are clear on the standard of behaviour expected of them.

The term 'low level concern' does not mean that the behaviour is insignificant. It means a behaviour towards a child which does not meet the threshold set out in section 15 of this policy and part 4 of Keeping Children Safe in Education 2022. A low level concern is any concern (no matter how small, and even if no more than causing a sense of unease) that an adult working in or on behalf of the school may have acted in a way that:

- is not consistent with the staff code of conduct, including conduct outside of the workplace, and/or
- does not meet the allegations threshold or is otherwise not considered serious enough for a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Behaviours which are not consistent with the standards and values of our Trust, and which do not meet the expectations set out in our code of conduct for staff, must be addressed. Behaviours such as this, can exist on a spectrum from inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is essential that concerns such as this are shared responsibly and with the right person, and that they are recorded and dealt with appropriately. Effective reporting and management of such concerns also protects staff from potential false allegations of misunderstandings. Concerns should be shared as soon as is reasonably possible, and ideally within 24 hours of becoming aware of a problem, however it is never too late to share a concern.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or may appear compromising to others. Equally, a member of staff may have behaved in a manner which, on reflection, they consider to fall below the standards set out within our code of conduct for staff. Self-reporting such circumstances is actively encouraged as it allows issues to be dealt with at the earliest opportunity and it is an important means of maintaining our culture of everyone aspiring to have the highest standards of conduct and behaviour.

In practice, the words 'allegation' and 'concern' can be and are used interchangeably by different people. Sometimes individuals may shy away from the word 'allegation' and express it as a 'concern' instead. The crucial point is that whatever the language used, the behaviour referred to may, on the one hand, be capable of meeting the harm threshold, or, on the other, it does not meet the harm threshold. The focus should not therefore be on the language used by the person disclosing it; the focus should, instead, be on the behaviour being described.

Reporting Low Level Concerns

Staff do not need to be able to determine whether their concern is a low level concern, or if it would be dealt with under our managing allegations of abuse made against staff policy. Staff must simply be empowered to share their concern. The determination regarding process will be made by the one of the Trust's school's designated safeguarding leads, applicable headteacher, CEO or Chair of Trustees (if concerning the CEO).

Low level concerns should be reported in writing to the Headteacher, CEO or Chair of Trustees (as applicable). Where a low level concern is in relation to a Headteacher, it should be shared with the CEO. It is important that low-level concerns are shared with the DSL as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it should also be emphasised that it is never too late to share a low level concern and a delay should never be seen as a barrier to sharing. It is critical that all low-level concerns above are ultimately received by the DSL. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is potentially lost.

If any low-level concern relates to the behaviour of the DSL it should be dealt with in accordance with the principles laid out in Keeping Children Safe in Education.

If a report of a low level concern is received, it will be dealt with responsively, sensitively, and proportionately. Where a concern is reported, the Headteacher, CEO or Chair of Trustees (as applicable) should collect as much evidence as possible by speaking directly with the person who raised the concern (unless it has been raised anonymously), and by speaking to the individual involved along with any witnesses. The information collected will help to categorise the behaviour and determine what further action may need to be taken. Support and advice will be provided to ensure any identified behaviours can be corrected at an early stage.

Once the DSL has received the low-level concern, they will (not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them):

- speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary has been provided;
- speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted);
- review the information and determine whether the behaviour:
 - is entirely consistent with the code of conduct and the law,
 - constitutes a low-level concern,
 - is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO,
 - when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO;
 - meets the threshold of an allegation and should be referred to the LADO;
- Where they are in any doubt whatsoever, the DSL will always seek advice from the LADO.
- While responding to any incident, the DSL will make appropriate records of:

- all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses (subject to the above);
- all external conversations – for example, with the LADO (where they have been contacted);
- their determination;
- the rationale for their decision; and
- any action taken.

If it is determined that an employee's behaviour that is presented as a low-level concern is entirely consistent with the Code of Conduct and the law, the DSL will:

- update the 'employee of concern' and inform them of the action taken as above;
- speak to the employee who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the Code of Conduct and the law;
- consider if the situation may indicate that the low-level concerns policy is not clear enough, or if further training is required, especially if similar/repeat concerns are raised.

If it is determined that the behaviour constitutes a low-level concern:

- It will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting employees from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis;
- Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;
- In many cases, a low-level concern will simply require a conversation with the 'employee of concern'. It has long been understood that lasting change in behaviour is least likely to be achieved by an approach perceived as critical or threatening.
- Any such conversation will include being clear with the employee as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question.
- Ongoing and transparent monitoring of the employee's behaviour may be appropriate.
- Some low-level concerns may also raise issues of misconduct or poor performance. The DSL will also consider whether this is the case – by referring to the Disciplinary policy and/or Capability procedure and taking advice from HR where necessary.

Where a determined low-level concern relates to a person employed by a supply agency or a contractor, that concern will be raised with their employers, so that any potential patterns of inappropriate behaviour can be identified. How an organisation responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee, or worker to whom the organisation's disciplinary procedure would apply; or a contractor, Director or volunteer who may be subject to alternative procedures.

Some concerns may trigger the Trust's disciplinary, grievance or whistleblowing procedures, which

should be followed where appropriate. Where low-level concerns are raised which require other internal processes to be followed, it is sometimes difficult to determine how best to investigate the concern and which procedure to follow. The DSL will exercise their professional judgement and, if in any doubt, they will seek advice from other external agencies including the LADO;

If the Trust's disciplinary procedure is triggered, the Trust will ensure that the employee has a full opportunity to respond to any factual allegations which form the basis of a disciplinary case against them.

If it is determined that the behaviour, whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, then action (if/as necessary) will be taken in accordance with the LADO's advice.

If, when considered with any other low-level concerns that have previously been shared and determined about the same employee, such concerns could now meet the threshold of an allegation, then it should be referred to the LADO in accordance with Part 4 of Keeping Children Safe in Education, using the allegations section of this policy

Storage and Retention of Low-Level Concern Records

All low level concerns will be recorded in writing and this record should include the details of the concern, the context and the action taken, including the rationale for any decisions. Records must be kept confidential and held securely in line with the Data Protection Act 2018 and the UK General Data Protection Regulation. Sound professional judgement will be exercised by the DSL in determining what information is necessary to record for safeguarding purposes. The name of the individual sharing the low-level concern and their role should be stated, as should the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is raised. If the employee who the concern relates to has an opposing factual view of the incident, this will be fairly recorded alongside the concern. The record will include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record must be signed, timed and dated. Records of low-level concerns will be kept in a central. Electronic, low-level concerns file and records will be retained for the duration of the individual's employment. Where multiple low-level concerns have been shared regarding the same employee these will be kept in chronological order as a running record. Information will be recorded by the applicable DSL upon the instruction of the Headteacher, CEO or Chair of Trustees (as applicable). This information will be kept securely on file.

The rationale for storing such records on a central file, rather than in an employees personnel file, is that:

- it makes it easier to review the file and spot any potential patterns of concerning, problematic or inappropriate behaviour;
- encourages employees to share low-level concerns; and
- it keeps low-level concerns separate from an employees record were they do not result in a disciplinary or any other relevant process being followed that would be required to be held on the employees record.

Material on the personnel file will be retained in accordance with Part 4 of Keeping Children Safe in Education – which requires schools and colleges in England to produce a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept on the confidential personnel file of the employee, and a copy provided to them.

The DSL will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately and so that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Trust will decide on a course of action either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, referral to LADO. A record of these reviews will be made and stored alongside the file, along with any subsequent actions taken. The Local Governing Body will receive relevant data relating to Low Level Concerns and review anonymised samples of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

The Headteacher, CEO or Chair of Trustees will regularly review all low level concerns reported to them, along with the outcome of the concern. This is to ensure there is appropriate scrutiny and analysis of information in order to agree at what point a series of low level concerns or a pattern of behaviour would escalate and meet the threshold set out in part 4 of Keeping Children Safe in Education 2023. This will occur after each concern is raised and then during safeguarding review meetings.

Occasionally an employee may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, an employee may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct.

Self-reporting

Self-reporting in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

In line with Keeping Children Safe in Education 2023, the Trust will ensure that there is an environment where employees are encouraged and feel confident to self-refer.

Low-Level Concerns and Provision of References

Keeping Children Safe in Education prohibits organisations from referring to unsubstantiated, malicious or false allegations in references. Only safeguarding allegations that have been substantiated should be included in references. Keeping Children Safe in Education states that: "where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference".

Low level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

36. Safer recruitment

The Bay Learning Trust is committed to keeping pupils safe by ensuring that adults who work or volunteer in a school are safe to do so. We therefore ensure that:

- Lancashire County Council Human Resources Guidance is adhered to, to ensure that there is a strong reference and commitment to safeguarding during advertisement, selection and recruitment of new staff

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for teaching, training, instructing or the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.
(Regular is defined as; at least 3 times in a 30 day period.)

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The Governing/ Trust board will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The Trust will ensure that:

- The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.
- The original DBS certificate is seen for all appointees to the school, even where the on-line DBS system indicates that the check is clear
- There are sufficient staff/Governors/ Directors who have undertaken appropriate Safer Recruitment training in the last 5 years to enable at least one person on every recruitment panel to be appropriately trained and there are at least 2 people on each selection panel
- Covering letters will be obtained from agencies and other employers that provide staff to work in school to confirm that appropriate checks have been undertaken..
- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer
- A transfer of control agreement will be used where other agencies/organisations use school premises and are not operating under school's safeguarding policies and procedures
- With regard to Disqualification Under the Childcare Act we will adhere to Guidance from [Lancashire County Council Human Resources](#)
- It is good practice to ensure that this declaration is renewed annually for those staff working in a relevant setting and evidenced using the LCC staff confirmation form (May 2021). This form will be retained and stored securely.

- When an issue is declared, advice will be sought from Ofsted about the need to apply for a waiver. If a waiver is necessary, a risk assessment will be carried out and proportionate measures put in place until a waiver has been issued or matters resolved. If it is not resolved, this must be reported: disqualification@ofsted.gov.uk
- Advice will be sought from Human Resources, LADO and/or Schools Safeguarding Officers if any staff are unclear about any aspects of Safer Recruitment.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity.

37. Single central record (SCR)

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees who work at the school. All members of the proprietor body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check (for relevant staff)
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions
- Any other information deemed relevant.

Checks are conducted for volunteers and Governors, and these are also recorded on the SCR.

38. Review

This Policy is subject to ongoing review; however, will be reviewed no later than September 2024.

SAFEGUARDING AND CHILD PROTECTION

TAKING ACTION ON CHILD WELFARE/PROTECTION CONCERNS AT THE BAY LEARNING TRUST

Concern, Disclosure or Suspicion

Physical, Emotional, Sexual Abuse or Neglect, Fabricated or Induced Illness, Honour-based violence, **or** you just have a sense that something isn't quite right.

Do make a note of your concerns and liaise with the Designated Safeguarding Lead (DSL) in school as soon as possible and always before the end of that school day

Do not do nothing, 'investigate', 'diagnose', prompt, probe or lead the child, try and sort it out yourself, breach confidentiality, worry about being 'wrong' and / or 'bothering' senior staff.

Note: ANYONE CAN MAKE A REFERRAL

DSL Considers

- Current concern / incident / events & and relevant historical information
 - Possible explanations & any contemporaneous events
 - The need to seek further, external information / advice
- LCC School's SG: 01772 531196**
CYPsafeeduc@lancashire.gov.uk
- Action / options (inc. discussion with parents)

The DSLs are:

Lead Jamie Fox

Deputy DSLs Katie Benter

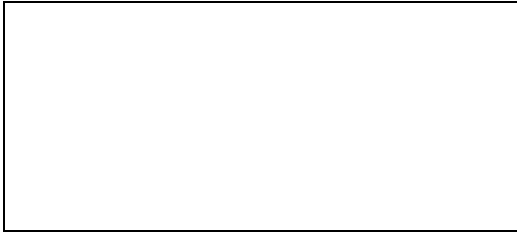
Need for Early Help / Support Identified

- Discuss with DSL / pastoral staff
- Discuss with parents
- Agree ongoing monitoring / in- school support
- Obtain consent
- Follow locally agreed protocols including: Continuum of Need and Thresholds and Early Help guidance
- Possible Channel Referral
- Record
- DSL monitors and reviews.
- May consider need for Child in Need / Section 17 referral to CSC

Or

Child Protection / Section 47 Referral to Children's Social Care

- Where it is clear that a child protection referral is necessary then the matter should be reported to Children's Social Care without delay **0300 123 6720**
- Out of hours referral should be made to the duty team **0300 123 6721/3** ;
- Notify police if a crime has been committed;
- Inform parents (as and when appropriate & in-line with any advice from CSC / Police)
- DSL records response from CSC (within 24 hrs) / seeks one where none is received / escalates where unhappy with response



- Anyone can make a referral! If this is someone other than the DSL in school then the DSL must be informed asap

DSL records, feeds-back, monitors and updates on a need to know basis

SAFEGUARDING INFORMATION	
Websites and Links	
LSCB Procedures	http://panlancashirescb.proceduresonline.com/index.htm
LSCB Website (currently still available although CSAP will replace)	Education reps, Lancashire Serious Case Reviews, multi-agency safeguarding training, LSCB 7 min briefings http://www.lancshiresafeguarding.org.uk/
Early Help Lancashire	http://www.lancashirechildrenstrust.org.uk/resources/?siteid=6274&pageid=44350
Safeguarding Adults (18+)	http://www.lancashire.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults.aspx
HR & Legal	
Schools' Safeguarding	Victoria Wallace 01772 531196 / 532723
Children's Social Care	0300 123 6720 (Referrals) cypreferrals@lancashire.gov.uk
Out of Hours referral	0300 123 6722
Education Early Support Co-ordinators	Martin Blokland 01254 220914 martin.blokland@lancashire.gov.uk Matt Chipchase 01254 220989 / 01254 837975 matt.chipchase@lancashire.gov.uk
Local Authority Designated Officer	Tim Booth /Shane Penn / Donna Green 01772 536694 LADO.admin@lancashire.gov.uk
Children Missing Education Contact	01257 517333 cme@lancashire.gov.uk
Child Sexual Exploitation Team	Operation Awaken Blackpool, Fylde, Lancaster, Morecambe and Wyre 01253 477 261
Prevent / Channel Contact / referrals	101 (non-urgent) Anti-Terrorism Hotline 0800 789 321 Preston, Lancaster, Skelmersdale, Blackpool etc Telephone: 01772 209733 / 830, Central Safeguarding Team, Hutton HQ: 01772 413029 concern@lancashire.pnn.police.uk
Virtual School Head	01772531853 Elac.team@lancashire.gov.uk
School Lead for LAC	Mr P Wilson ext 1006
Other Useful Contacts	
LCC Employee Welfare & Counselling	08000 214 154 www.youreap.co.uk
Whistle Blowing	01772 532500 WhistleblowingComplaints@lancashire.gov.uk
NSPCC Whistle-blowing helpline	0800 028 0285 Lancashire 01772 532500 WhistleblowingComplaints@lancashire.gov.uk
Public Concern at Work	0207 404 6609 or www.pcaw.org.uk
Online Safety Helpline	For professionals 0844 381 4772
National Domestic Abuse Helpline	0808 2000 247
Child Line	0800 11 11
NSPCC Helpline Adults inc. parents	0808 800 5000 or text: 88858 help@nspcc.org.uk
NSPCC FGM helpline	0800 028 3550 email: fgmhelp@nspcc.org.uk

Safer Recruitment Training

Safer Recruitment Training in line with KCSiE 2023 and The School Staffing (England) Regulations 2009 require governing bodies of maintained schools to ensure that at least one person on any appointment panel has undertaken safer recruitment training. (LCC recommends this is updated every 5 years)

Name	Role	Training Date	Provider
Sally Kenyon	CEO	March 2022	NSPCC
Andrew McKinnell	COO	March 2022	NSPCC
Sue Farrimond	Director of Professional Development	March 2022	NSPCC
Felicity Ackroyd	SCITT Director		
Fiona Graham	Governance Professional	March 2023	NSPCC
Caroline Wilson	HR Associate	March 2022	NSPCC
Directors			
John Crewdson	Chair of Directors	March 2023	NSPCC