



**THE BAY  
LEARNING TRUST**

## **Safeguarding and Child Protection Policy**

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## Document Control

<b>This document has been approved for operation within:</b>	<b>All Trust Establishments</b>
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**The Bay Learning Trust**

**SAFEGUARDING AND CHILD PROTECTION POLICY**

Safeguarding Team

Role	Name	Contact Details
Designated Safeguarding Lead	Jamie Fox	foxj@baylearningtrust.com
Deputy Designated Safeguarding Lead	Katie Benter	benterk@baylearningtrust.com

Referrals Contact Information

Body	Contact Details
Child Exploitation & Online Protection	Operation Awaken Blackpool, Fylde, Lancaster, Morecambe and Wyre 01253 477 261 Online Safety Helpline For professionals 0844 381 4772
Police	Tel: 999 or 101 Or phone LCC MASH (Multi-Agency Safeguarding Hub) Education Officers: Matt Chipchase & Jennifer Ashton Jennifer Ashton 01772 531643 jennifer.ashton@lancashire.gov.uk Matt Chipchase 01254 220989 matt.chipchase@lancashire.gov.uk
LADO	Tim Booth, Donna Green & Shane Penn, 01772 536694 LADO.admin@lancashire.gov.uk
Social Services	Children's Social Care 0300 123 6720 (Referrals) cypreferrals@lancashire.gov.uk Out of Hours referral 0300 123 6722
Safeguarding Partners	LCC School Safeguarding Officers Victoria Wallace & Heather Fowler, 01772 531196 school.safeguarding@lancashire.gov.uk

## 1. Compliance

1.1. This policy has been prepared with due regard to the following statutory provisions and guidance:

1.1.1.Children Act 1989;

1.1.2.Children Act 2004;

1.1.3.Childcare Act 2006;

1.1.4.Children and Social Work Act 2017;

1.1.5.Crime and Disorder Act 1998;

1.1.6.Education Act 1996;

1.1.7.Education Act 2002;

1.1.8.Education and Skills Act 2008;

1.1.9.Female Genital Mutilation Act 2003;

1.1.10. Housing Act 1996;

1.1.11. Legal Aid, Sentencing and Punishment of Offenders Act 2012;

1.1.12. Police Reform and Social Responsibility Act 2011;

1.1.13. The Department for Education's statutory guidance, "Keeping children safe in education" 2021;

1.1.14. The Department for Education's statutory guidance, "Sexual violence and sexual harassment between children in schools and colleges" September 2021;

1.1.15. HM Government's guidance, "Multi-agency statutory guidance on female genital mutilation" July 2021; and.

1.1.16. HM Government's guidance, "Working together to safeguard children" July 2018.

## 2. About this policy

2.1. **The Bay Learning Trust** ("the **Trust**"]") is committed to doing all it can to protect and safeguard the wellbeing of its pupils.

2.2. The **Trust** believes that children and young people have a fundamental right to be protected from harm, to be kept safe and have their welfare promoted. Pupils have the right to expect the **Trust** to provide a safe and secure environment.

2.3. Everyone who comes into contact with children and their families has a role to play in safeguarding children. The **Trust** acknowledges that its teachers and other employees are in a unique position to identify and to help abused and vulnerable children.

2.4. The purpose of this policy is to provide employees and **Trustees** with the framework they need in order to keep children safe and secure in the **Trust** and to inform parents and guardians how the **Trust** will safeguard pupils whilst within the **Trust's** care.

2.5. Unless otherwise stated this policy applies to all members of the **Trust** community, namely pupils, employees at all levels and grades (including senior managers, trainees, part-time and fixed term employees who for the purposes of this policy will be collectively referred to as **employees**), officers, **Trustees**, and volunteers.

2.6. The **Trust** is commitment to:

2.6.1. the practise of safe recruitment in checking the suitability of employees and volunteers to work with the **Trust's** pupils;

2.6.2. raising pupil awareness of child protection and equipping pupils with the skills they need to keep them safe;

2.6.3. raising pupil awareness of peer on peer abuse and providing pupils with knowledge about reporting systems;

2.6.4. developing and implementing procedures for identifying and reporting cases or suspected cases of abuse and to training employees to use these procedures effectively;

2.6.5. supporting vulnerable pupils and those in difficult circumstances, as well as supporting those pupils who have been abused in accordance with agreed child protection plans; and,

2.6.6. establishing a safe environment in which children can learn and thrive.

2.7. In recognising that employees are well placed to observe the outward signs of abuse the **Trust** will:

2.7.1. establish and maintain an environment in which pupils feel safe and secure and where they are encouraged to talk and are listened to seriously;

2.7.2. ensure that pupils know that there are adults in the **Trust** about one of their peers;

2.7.3. include appropriate opportunities within the curriculum for pupils to develop the skills to recognise abuse and to stay safe; and,

2.7.4. ensure that wherever possible, every effort is made to establish working relationships with families and with colleagues within other agencies. The **Trust** will support the work of social care, the police, health services and other services to promote the welfare of pupils and protect them from harm. It should be noted that data protection is not a barrier to information sharing in relation to potential safeguarding concerns.

### 3. Roles and responsibilities

3.1. The **Trust Board** has overall responsibility for the effective operation of this policy and for ensuring compliance with any statutory framework.

3.2. The **Trust Board** has the responsibility to ensure that:

- 3.2.1.the **Trust** complies with legislation relating to child protection;
  - 3.2.2.the **Trust** develops and adopts a Child Protection Policy and that procedures are in place that are in accordance with Department for Education and locally agreed inter-agency procedures;
  - 3.2.3.the Child Protection Policy is reviewed annually and made available on the **Trust** website or hard copy form from the **Trust**'s reception;
  - 3.2.4.the **Trust** is using safe recruitment procedures and that appropriate checks are carried out on new employees, **Trustees** and volunteers;
  - 3.2.5.there is at least one person on every recruitment panel (when applicable) that has completed Safer Recruitment training;
  - 3.2.6.the **Trust** has procedures in place for reporting and dealing with allegations of abuse against employees and volunteers that comply with guidance from the Local Authority and the locally agreed inter-agency procedures;
  - 3.2.7.senior members of the **Trust** leadership team are designated to take lead responsibility for safeguarding and child protection and that appropriate deputies are also appointed to support the lead role (details of key employees are contained in Appendix A);
  - 3.2.8.that a **Trustee** is nominated to be responsible for liaising with the Local Authority in the event of allegations of abuse being made against the **Chief Executive Officer**. This will usually be the Chair of **Trustees**.
  - 3.2.9.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** community 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;
  - 3.2.10. all employees are aware of their statutory duty to report Female Genital Mutilation ("FGM") to a member of their Safeguarding Team and the Police;
  - 3.2.11. ensure every employee, along with volunteers and **Trustees** read and understand part one of the DfE's Keeping Children Safe in Education; and,
  - 3.2.12. consideration is given to how pupils are taught, as part of a broad and balanced curriculum, the importance of safeguarding, including on-line safety.
- 3.3. The named **Trustee** for safeguarding is responsible for:
- 3.3.1. maintaining regular contact with the **Trust**'s Designated Safeguarding Lead;

- 3.3.2. 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;
- 3.3.3. being responsible for liaising with the local authority in the event of allegations of abuse being made against the **Chief Executive Officer**;
- 3.3.4. ensuring that this policy is effective and that local child protection guidelines set by the Local Authority Designated Officer (LADO) Lancashire County Council are complied with.

3.4. The **Chief Executive Officer** will ensure that:

- 3.4.1. the policies and procedures adopted by the **Trustees** are fully implemented and followed by all employees;
- 3.4.2. ensure that policies and procedures are kept updated to reflect changes in the law and government advice in conjunction with the Designated Safeguarding Lead;
- 3.4.3. sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other employees to discharge their responsibilities effectively; and,
- 3.4.4. all employees and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in accordance with the **Trust's** whistle blowing policies.

3.5. The Designated Safeguarding Lead is a senior employee responsible for:

- 3.5.1.the provision of leadership and vision in respect of child protection (including online safety);
- 3.5.2.ensuring there are mechanisms in place to ensure employees and **Trustees** are aware of, understand and can discharge their role and responsibilities under this policy;
- 3.5.3.monitoring the effectiveness of this policy and procedures and supporting the **Trustees** with its annual review;
- 3.5.4.ensuring that all employees, **Trustees** and volunteers have the details of the Designated Safeguarding Lead and deputy;
- 3.5.5.the practical implementation of the child protection policy in ensuring that child protection procedures are followed within the **Trust** and that appropriate referrals are made to the appropriate agencies;
- 3.5.6.the management of referrals involving suspected abuse or allegations to the relevant investigating agencies, police or the Local Authority Designated Officer ("LADO") and

- 3.5.7. the liaison between the Safeguarding Team, the **Chief Executive Officer**, the senior leadership team and **Trustees** within the **Trust** in respect of safeguarding matters or issues and in particular any on-going enquires and/or police investigations;
  - 3.5.8. the recording of detailed, accurate secure written records of concerns, referrals and actions undertaken in respect of safeguarding;
  - 3.5.9. the co-ordination of all activities related to child protection and children in care, including record keeping, **Trust** 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;
  - 3.5.10. being alert to the specific needs of children in need, those with special educational needs and young carers;
  - 3.5.11. the provision of training to all employees employed within the **Trust** so that they are aware of signs of abuse, what they need to do if they think that a pupil is being abused and how they can protect themselves from an allegation;
  - 3.5.12. ensuring every employee and volunteer read and understand part one of the DfE's Keeping Children Safe in Education;
  - 3.5.13. ensuring that, as Designated Safeguarding Lead, he/she has received the appropriate training every two years with at least one annual update;
  - 3.5.14. to ensure that there is always appropriate cover in place for this role as and when required;
  - 3.5.15. attending child sexual exploitation training;
  - 3.5.16. maintaining awareness of PREVENT/Channel referrals in conjunction with relevant police/Local Authority guidance;
  - 3.5.17. ensuring information, particularly special categories of information, is shared and stored in compliance with data protection laws (including the General Data Protection Regulation);
  - 3.5.18. ensuring that this policy is available publicly and that parents are made of its 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**.
- 3.6. All employees are expected to:
- 3.6.1. know the name of the Designated Safeguarding Lead and deputy and to understand the role of the Designated Safeguarding Lead and his/her team;
  - 3.6.2. understand and comply with this policy and its procedures;

- 3.6.3. have read and understood part one of the DfE's Keeping children safe in education (as amended from time to time);
  - 3.6.4. attend appropriate training;
  - 3.6.5. behave in accordance with the **Trust's** Staff Code of Conduct;
  - 3.6.6. deal with any incidents of bullying that may occur in accordance with **Trust** procedures;
  - 3.6.7. refer e-safety concerns to the Designated Safeguarding Lead or a member of his/her team;
  - 3.6.8. be aware of the **Trust's** obligation to pay due regard to the need to prevent people from being drawn into terrorism. Report any concerns of this nature to Designated Safeguarding Lead or a member of his/her team;
  - 3.6.9. be aware of their own statutory duty to inform the police of any reported incident of FGM along with reporting it to the Designated Safeguarding Lead or a member of his/her team;
  - 3.6.10. monitor vulnerable pupils within tutor groups and in lessons, reporting emerging concerns swiftly to Designated Safeguarding Lead or a member of his/her team to enable early identification and assessment;
  - 3.6.11. address risks and prevent issues escalating by recognising and adhering to the principal of early referral to the Designated Safeguarding Lead or a member of his/her team upon recognition of the early signs or abuse and neglect; and,
  - 3.6.12. understand the difference between an early help concern and an immediate danger/risk of harm situation and acting accordingly when reporting the concern to Designated Safeguarding Lead or a member of his/her team.
- 3.7. The local arrangements in place for the **Trust** involve the following key individuals and organisations:
- 3.7.1. LADO – Local Authority Designated Officers: Tim Booth, Donna Green & Shane Penn  
Tel: 01772 536694 Email: LADO.admin@lancashire.gov.uk
  - 3.7.2. 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.
  - 3.7.3. LCC School Safeguarding Officers: Victoria Wallace & Heather Fowler Tel: 01772 531196 Email: school.safeguarding@lancashire.gov.uk
- 3.8. All pupils, parents, guardians, carers, supply staff and volunteers are expected to be aware of and comply with this policy and its procedures.

#### 4. Safeguarding generally

4.1. This policy and all action relating to it is in line with the following guidance:

4.1.1. Keeping Children Safe in Education (2021). This policy must be read alongside this statutory guidance and all employees must read part 1 of this guidance document, as amended from time to time;

4.1.2. What to do if you're worried that a child is being abused guidance (March 2015);

4.1.3. Working Together to Safeguard Children Document (July 2018); and

4.1.4. Counter Terrorism and Security Act 2015 together with the Revised Prevent Duty guidance for England and Wales (July 2015).

4.2. Employees will be kept informed about safeguarding responsibilities and procedures through induction and briefings. All new employees will attend a training session on safeguarding as part of their induction programme as well as receiving the **Trust's** Staff Code of Conduct, e-safety and part one of Keeping Children Safe in Education. Where other adults are working in regulated activity within **Trust**, the Chief Executive Officer or the Designated Safeguarding Lead will ensure that they are aware of the contents of these policies. Any trainee teachers will receive a training session on child protection awareness as soon as possible after their arrival.

#### 5. Procedures – concern about a pupil

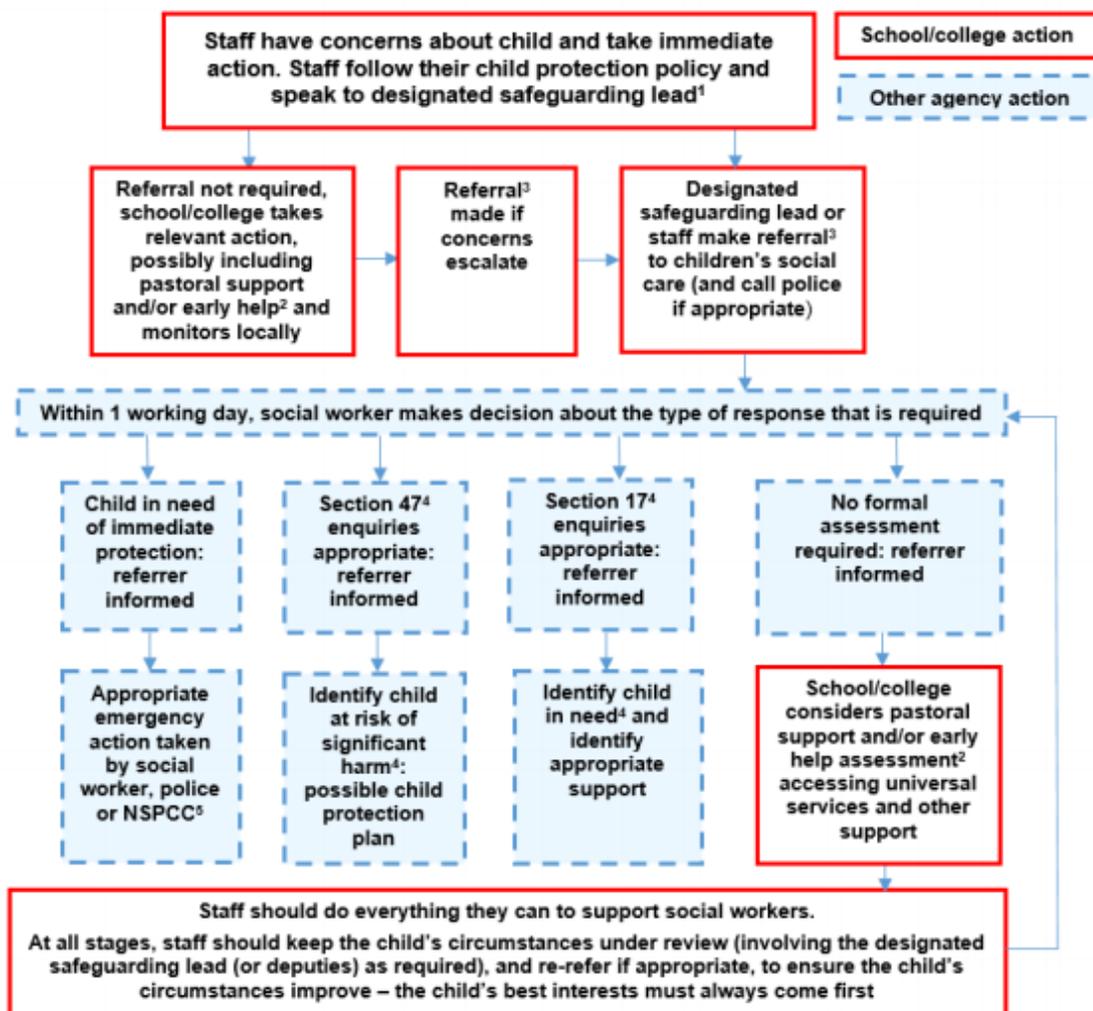
5.1. Anyone who receives a disclosure of abuse, an allegation of abuse or who suspects that abuse may have occurred must report it immediately to the Designated Safeguarding Lead or one of his/her team; in their absence the matter should be brought to the attention of the **Chief Executive Officer** or the most senior employee in the **Trust**. This should be followed with a written record within 24 hours, using as far as possible the pupil's own words. It is important to remember that any employee can refer their concerns to the Local Authority directly along with informing their Designated Safeguarding Lead. Employees must take further action if they feel the **Trust** has not acted appropriately or robustly to safeguard. This may involve reporting to the **Chair of Trustees**, direct to the Local Authority Designated Officer (LADO), the NSPCC whistleblowing line 0800 028 0285 [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or police.

5.2. The Designated Safeguarding Lead (or one of the Safeguarding Team) will immediately refer cases of suspected abuse or an allegation of abuse to the relevant investigating agency by telephone or email and in accordance with the procedures outlined by the Local Authority's Safeguarding Team. Any referral will be confirmed in writing within 24 hours. Where possible the **inter-agency referral form** should be used. Where the allegation is against an employee, the **Chief Executive Officer** must first be informed.

5.3. If the Designated Safeguarding Lead (or one of the Safeguarding Team) is unsure about whether a formal referral should be made or has a general concern about a child's health or development, advice should be sought from local social care, the NSPCC or the Local Authority Safeguarding Service.

- 5.4. The **Trust** will inform parents/carers of the **Trust's** actions **unless it is the Trust's view that so doing could place the child at greater risk of harm** or could impede a criminal investigation.
- 5.5. The **Trust** will inform parents and carers about the **Trust's** duties and responsibilities under safeguarding procedures.

### Actions where there are concerns about a child



## 6. Early help

- 6.1. The **Trust's** aim is to identify any pupil/student/families who could benefit from further support at the earliest stage possible. This support may involve sign posting/referring/information sharing with the appropriate agencies, family support worker interventions, counselling, liaising/information sharing with agencies already working with families, assessments as well as offering the support from **Trust's** pastoral team.

6.2. The **Trust** monitor pupils to ensure that the **Trust** can identify emerging trends that may indicate safeguarding issues for Care/Police/ PREVENT panels to take decisions about individual pupils.

6.3. The **Trust** will listen and take seriously any disclosure or allegation of abuse and any concern expressed about the safety and well-being of **Trust's** pupils.

6.4. Children and young people in the following categories will be given particular attention:

6.4.1. disabled and have specific needs;

6.4.2. has SEN or additional needs;

6.4.3. is a young carer;

6.4.4. is being drawn into anti-social or criminal behaviour;

6.4.5. frequently goes missing from home or care or has returned home from care;

6.4.6. at risk of modern slavery, trafficking, exploitation and/or radicalised;

6.4.7. in a family setting which poses challenges;

6.4.8. is misusing drugs and/or alcohol; or

6.4.9. is privately fostered.

## 7. Multi-agency working

7.1. The **Trust** has a pivotal role to play in multi-agency safeguarding arrangements. The **Trust** has a statutory duty to co-operate in safeguarding arrangements and will make arrangements to work with appropriate relevant agencies to safeguard and promote the welfare of children in its care.

7.2. 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.

7.3. The **Trust** will allow access for children's social care from the host local authority to allow them to conduct or to consider whether to conduct a section 17 or a section 47 assessment.

## 8. Searching, screening and confiscation

8.1. The **Chief Executive Officer** and/or authorised employee have the statutory power to search a pupil/s or his/her possessions, without consent, where they have reasonable grounds for suspecting that a pupil/s may have prohibited items. The **Chief Executive Officer** and members of the Central Team will follow the appropriate school's policy on this.

## 9. Procedures – allegation against an employee

- 9.1. It is essential that **Trust's** high standards of concern and professional responsibility adopted with regard to alleged child abuse are similarly displayed when adults working in **Trust** are accused, no matter how difficult this may be.
- 9.2. Corporal or physical punishment of children in **academies** is unlawful. The **Chief Executive Officer** and members of the Central Team will follow the appropriate school's policy on this. -
- 9.3. If an allegation is made against an employee, worker or volunteer the **Chief Executive Officer** (or his/her deputy in his/her absence) should contact the LADO. When contacting the LADO, the **Chief Executive Officer** should be prepared to advise of interim safeguarding measures that can be put in place around the adult who has been the subject of the allegation(s).
- 9.4. The **Trust's** HR adviser should also be consulted. With the Designated Safeguarding Lead, a decision will be made as to whether the incident should be immediately referred to social care and/or the police. If this is agreed, the **Chief Executive Officer** should inform social care by telephone and follow this with written confirmation within 24 hours, preferably by e-mail. In addition, the **Chief Executive Officer** should inform the Designated **Trustee** for safeguarding. Should the allegation be against the **Chief Executive Officer**, a deputy or the Designated Safeguarding Lead, the **Chair of Trustees** and the LADO should also be informed.
- 9.5. If for any reason it is decided that a referral to LADO is not appropriate, it may be necessary to address matters in accordance with the **Trust's** disciplinary procedures in liaison with the **Trust's** HR Advisor. Where no further action is required, details and decisions should be recorded in a confidential file.
- 9.6. If the LADO directs the **Trust** to investigate the allegations, the Designated Safeguarding Lead should arrange for an internal investigation to be undertaken in accordance with the provisions set out in part 4 of Keeping Children Safe in Education. This may be combined with an investigation under the **Trust's** disciplinary policy.
- 9.7. Any employee who is concerned about the conduct of another employee or adult on the **Trust** premises should contact the **Chief Executive Officer** as part of the **Trust's** whistleblowing procedures.
- 9.8. **If there are any concerns about safeguarding practices within the Trust, employees and volunteers should feel able to raise concerns about 'unsafe' practice and potential failures to the Chief Executive Officer, his/her deputies or a member of the Safeguarding Team. Should concerns be about the Chief Executive Officer and/or the Designated Safeguarding Lead, the Chair of Trustees should be contacted; any member of the Senior Leadership Team will provide details. Should you have any concerns about this process, you can still contact the LADO directly. Employees can also contact the NSPCC Whistleblowing line 0800 028 0285 [help@nspcc.org.uk](mailto:help@nspcc.org.uk).**
- 9.9. The **Trust** will refer to the DBS anyone found to be harming/harmed or posing a risk/threat of harm to a pupil, or if there is a reason to believe this has happened.

## 10. Training and support

- 10.1. The **Chief Executive Officer** will ensure that the Designated Safeguarding Lead undertakes the necessary child protection training and that this is updated at regular intervals.
- 10.2. The Designated Safeguarding Lead will ensure that all members of the Safeguarding Team have adequate, regular training.
- 10.3. The Designated Safeguarding Lead (or a member of the Safeguarding Team) will offer safeguarding training as part of the induction package for all employees. The Designated Safeguarding Lead will also raise awareness of child protection issues as necessary at briefings. This training should raise awareness of safeguarding issues, clarify the actions to be taken if abuse is disclosed, alleged or suspected and also encourage employees to keep themselves as safe as possible from an allegation being made against them. Such training must be 'regularly' updated; however, every employee has refresher training at the start of the new **School** year, enhanced training during the year along with e-safety training annually and on-going briefings throughout the year i.e. to share lessons learned.

## 11. Confidentiality

- 11.1. All employees need to understand that the only purpose of confidentiality is to benefit the pupil. No one should guarantee confidentiality to a pupil nor should they agree with a pupil to keep a secret, as any child protection concern must be reported to the Designated Safeguarding Lead (or one of the Safeguarding Team) and may require further investigation by the appropriate authorities.
- 11.2. Employees, workers and volunteers will be informed of relevant information in respect of individual cases regarding child protection issues on a "need to know basis" only. Any information shared in this way must be held confidentially to themselves and in accordance with data protection laws in force from time to time.
- 11.3. Parents of children who are the alleged victims of a safeguarding matter must be kept informed as matters progress.

## 12. Records and Monitoring

- 12.1. Accurate records are essential to good child protection practice and mandatory under data protection laws.
- 12.2. Any one receiving a disclosure of abuse or noticing signs of possible abuse must make an accurate record within 24 hours of reporting the incident, this should include;
  - 12.2.1. a clear and comprehensive summary of the concern;
  - 12.2.2. details of how the concern was followed up and resolved; and,
  - 12.2.3. a note of any action taken, decisions reached and the outcome.

- 12.3. This record must be signed and dated using the appropriate school's procedures. If a member of staff is in doubt about recording requirements they must discuss this with the designated safeguarding lead.
- 12.4. File notes are kept for any pupil on Child Protection Plan (CPP) or for any pupil monitored for child protection reasons.
- 12.5. These records are kept in a locked cupboard with limited designated access and electronically on a secure area of the **Trust** communications system with appropriate encryption measures.
- 12.6. If a pupil transfers from the **Trust**, any child protection notes will be forwarded to the pupil's new school marked "confidential" and for the attention of the receiving school's Designated Safeguarding Lead. A signature of receipt will be requested. Local schools' files will either be collected or hand-delivered. Any electronic files to be transferred must be encrypted with the password to these files communicated separately to the designated person taking receipt.

### 13. Safer recruitment/practice

- 13.1. Every effort will be made to ensure the safe recruitment of employees and all legislation regarding safer recruitment will be followed. This will include:
  - 13.1.1. following statutory DBS guidelines regarding checks on employees;
  - 13.1.2. requiring a standardised application form and not just a C.V.;
  - 13.1.3. stating clearly on any advertisement or written information relating to employment the **Trust's** commitment to safeguarding children;
  - 13.1.4. ensuring at least one member of every interview panel has attended safer recruitment training;
  - 13.1.5. validating as far as possible qualifications, experience and expertise;
  - 13.1.6. proactively verifying references and testimonials as far as possible;
  - 13.1.7. verifying identity, preferably from current photographic ID and proof of address;
  - 13.1.8. verifying the right to work in the UK;
  - 13.1.9. Undertaking local police checks for those who have worked outside of the UK prior to being appointed to a role in the **Trust**;
  - 13.1.10. examining all career breaks, sudden job changes and/or dismissals;
  - 13.1.11. maintaining a single central record of all employees;
  - 13.1.12. all **Trustees** will have an enhanced DBS check and section 128 check;

- 13.1.13. check the Teacher Services system for any restrictions imposed by countries in the European Economic Area (EEA) for all employees in a teaching role, not just QTS, from these countries to ensure they are not subject to a Teacher Prohibition order under the Section 128 Education and Inspection Act 2008;
- 13.1.14. a Section 128 check will be carried out via Teacher Services system for any employee being employed to a managerial role;
- 13.1.15. all third party organisations will be supervised whilst working with the **Trust's** pupils and will not take part in regulated activity without confirmation in writing of an enhanced DSB check;
- 13.1.16. Local Authority, social care, police will always have their photo identity/warrant card checked when visiting site;
- 13.1.17. The **Trust** will follow the recommendations regarding trainee teachers and contractors as set out in Keeping Children Safe in Education (2021).
- 13.1.18. Contractors operating in pupil circulation areas will be supervised. Where services or activities are provided separately by another body, using the **Trust's** premises, the Governing Body will seek assurance that the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection.

#### 14. Supporting pupils

- 14.1. In the area of child protection there is a pyramid of need for the support of vulnerable pupils. At the top are those pupils on Child Protection Plans and those pupils for whom the **Trust** has major child protection concerns. Next are children 'Looked After' by the Local Authority, adopted children and those who are cared for by people other than a parent. Then the **Trust** has those pupils who take the role as a significant carer for a family member. The Designated Safeguarding Lead is responsible for ensuring that the **Trust** has an up to date list of these groups of pupils. The names of vulnerable pupils are available for employees to access via the Safeguarding Team so that they can monitor pupils and raise any concerns with the Safeguarding Team. Confidential details will not be included on this list.
- 14.2. Next is a larger group of pupils who are vulnerable in some other way. This may be because of family circumstances, health issues or social reasons. Lastly there are the majority of pupils, who do not need on-going extra support but may need some support for a short period of time. This may be, for example, in the case of family illness, crisis or bereavement. The Designated Safeguarding Lead regularly checks the **Trust's** first aid/medical request log for pupils seeking medical assistance, so that the **Trust** can identify concerns at an early stage. The **Trust** are committed to providing support for all these groups of pupils appropriate to their needs. This may be provided by the Safeguarding Team, a member of the leadership team, a head of year, tutor, or an adult in the **Trust** specifically approached to do so.

15. The **Trust** will endeavour to support pupils through:

- 15.1. the curriculum to encourage self-esteem and self-motivation;
- 15.2. the **Trust** ethos which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued;
- 15.3. the implementation of the **Trust's** behaviour management policies;
- 15.4. a consistent approach agreed by all employees which will endeavour to ensure the pupil knows that some behaviour is unacceptable but he/she is valued;
- 15.5. regular liaison with other professionals and agencies who support the pupils and their families;
- 15.6. a commitment to develop productive, supportive relationships with parents, whenever it is in the child's best interest to do so;
- 15.7. the development and support of a responsive and knowledgeable employee group, trained to respond appropriately in child protection situations;
- 15.8. recognition that statistically children with behavioural difficulties and disabilities are most vulnerable to abuse so employees who work in any capacity with children with profound and multiple disabilities, sensory impairment and / or emotional and behavioural problems will need to be particularly sensitive to signs of abuse;
- 15.9. recognition that in a home environment where there is domestic violence, drug or alcohol abuse, children may also be vulnerable and in need of support or protection.
- 15.10. The **Trust** has an ethos of respect and a culture that values, involves and listens to children. The **Trust** also support the **Trust's** pupils in a myriad of ways for many reasons. The **Trust** will try to help pupils understand what is and is not acceptable behaviour towards them and how to speak up if they have worries. The **Trust** also encourages pupils to speak up about concerns they may have for their peers.

## 16. **Children missing from education**

- 16.1. A pupil missing from education for eight sessions or more is a potential indicator of abuse and neglect. Should a pupil go missing at any time from the **Trust**, the Attendance Officer will inform the Designated Safeguarding Lead and contact the Local Authority. The Designated Safeguarding Lead will consider further actions/support should it be required. The **Trust** will inform the Local Authority of any pupil removed from the **Trust's** roll so that the Local Authority can identify and safeguard children missing from education.
- 16.2. The **Trust** will take reasonable steps to hold more than one emergency contact number for a child so that contact can be made to ensure the time missing from education is as limited as it can be in the circumstances.

## 17. Pupils on the child protection register or for whom the Trust has child protection concerns

- 17.1. The number of pupils on a child protection plan varies. There are also other pupils about whom the **Trust** has child protection concerns who are not on a child protection plans.
- 17.2. The **Trust** supports pupils in various ways by:
  - 17.2.1. following the guidance set out in any CPP;
  - 17.2.2. ensuring they know and are comfortable about whom they can approach for help or if they have specific concerns;
  - 17.2.3. monitoring their welfare carefully, including talking to them regularly about their wellbeing;
  - 17.2.4. attending any child protection conferences held on their behalf, including speaking on their behalf at such meetings should they request it;
  - 17.2.5. monitoring their attendance carefully and reporting any unexplained absence to social care;
  - 17.2.6. monitoring their academic grades carefully to try to ensure they are making good progress in the **Trust**;
  - 17.2.7. enlisting the support of and liaising with other agencies as appropriate;
  - 17.2.8. checking that they have access to all elements of **Trust** life, including visits and other activities;
  - 17.2.9. informing the pupil's head of year that they are on a CPP without breaching confidentiality so he/she knows to register immediately any concerns however minor with the Designated Safeguarding Lead (or a deputy).

## 18. Looked After and Previously Looked After Pupils

- 18.1. The **Trust** has a Designated Safeguarding Lead and a deputy(s) along with a **Trustee** responsible for Looked After Pupils. The **Trust** has also appointed a designated teacher to monitor and advocate for looked after and previously looked after pupils. The designated teacher is Jamie Fox who will promote the educational achievements of child who have left care, through adoption, special guardianship or child arrangement orders or who have been adopted from state care outside of England and Wales.
- 18.2. Each school ~~The Trust~~ keeps a list of pupils who are looked after by the Local Authority. In the light of the research that shows that these pupils fare less well at schools than their peers and to narrow this gap, the **Trust** monitors their progress and wellbeing carefully by:

- 18.2.1. being involved in and following the guidance set out in the pupil's personal education plan (PEP) and takes a particular interest in the pupil's welfare and to talk to them regularly;
  - 18.2.2. offering in **Trust** support such as anger management, assertiveness or social skills training as appropriate;
  - 18.2.3. targeting pupil premium specifically to support children in care;
  - 18.2.4. attending any liaison or review meetings held on their behalf, including speaking for them or acting as their advocate at such meetings should they request it, and keeping in touch with social workers and/or carers;
  - 18.2.5. monitoring their attendance carefully and reporting any unexplained absence to social care and the Local Authority;
  - 18.2.6. monitoring their academic grades carefully to try to ensure they are making good progress in the **Trust**;
  - 18.2.7. informing their head of year that they are on the Looked After Register without breaching confidentiality so he/she knows to register any concerns speedily to the Safeguarding Team;
  - 18.2.8. being careful not to accept any under achievement just because the child is 'Looked After';
  - 18.2.9. looking out for difficulties with homework or resources that may be a result of their being in care and giving them help to organise and manage their work and by providing the resources needed;
  - 18.2.10. enlisting the support of and liaising with other agencies as appropriate;
  - 18.2.11. checking that they have access to all elements of **Trust** life, including visits and other activities, and by giving these pupils the opportunities to take part in those self-esteem projects/residential visits organised by the **Trust** as and when appropriate.
- 18.3. In addition each school keeps a record of those pupils who are looked after by someone other than a parent, Adopted or on Special Guardianship plans.
- 18.4. The **Trust** understands that previously looked after children may still remain vulnerable and will continue to ensure their needs are monitored and met with other agencies being involved to ensure that those children are safeguarded.

## 19. Young carers

- 19.1. It is the responsibility of the Designated Safeguarding Lead (or a deputy) at each school, to keep a record of those pupils who play the part of a major carer for a family member. However, such families do not often publicise their situation for fear of social care involvement.

## **20. SEND**

20.1. Children are more likely to be abused or neglected and for this to go unnoticed. Disabled children may be less able to recognise or understand that they are being abused. Communication difficulties may make it harder for them to disclose abuse and/or dependency on their care giver may mean they have no-one to tell. The **Trust's** SENco will be a member of the Safeguarding Team. Professionals may focus on meeting the needs of the child's impairment, however the **Trust** will always try to ensure that the voice of the child is heard/sought.

## **21. Child Sexual Exploitation (CSE)**

21.1. CSE involves young people receiving something in exchange for sexual acts. Sexual exploitation can take many forms ranging from seemingly consensual relationships to serious gang and group exploitation. Keeping Children Safe in Education 2021 gives details about the signs to be alive to.

21.2. The **Trust** employees should be aware that sexual exploitation can take many forms and that pupils may not exhibit external signs of abuse. Therefore, employees must be vigilant for the less obvious signs, lots of new electronic equipment, when before there was none, seeming to have extra money to spend, moving away from established friendship groups, older boy/girlfriends, involved with other vulnerable children/adults etc.

21.3. When an electronic device is identified as containing an indecent image of a child (anyone under the age of 18) the employee will not view the image, they will confiscate the electronic device and refer straight to either the head of year, if the image is consensual between two children of a similar age, or, should the image not be consensual as described and or there appears to be an element of grooming it should be referred immediately to a member of the Safeguarding Team. The Designated Safeguarding Lead and at least one other member of the team will have undertaken child sexual exploitation training.

## **22. Peer on peer abuse, sexual violence and harassment**

22.1. Employees will recognise that children are capable of abusing their peers; this occurs when a child intentionally threatens, harms or causes distress to another child. Employees, must recognise that sexual violence and harassment can occur between two children of any age and sex. Employees will refer any concerns immediately to the relevant Head of Year and a member of the Safeguarding Team.

22.2. The risks to the welfare and wellbeing of children and young people can take many forms which we address in elsewhere in this policy. However, recent reports have demonstrated that sexual abuse, violence and harassment are at an unacceptable level and we are committed to ensuring that our established procedures clearly support pupils who may be targeted or fall victim to such

conduct. It has led to these matters being given the spotlight they deserve in through the 'Everyone's Invited' movement.

- 22.3. In this section we will highlight what we mean by sexual abuse and harassment and ensure our children, young people, staff and wider school community understand what it is and how they can raise concerns about such behaviour.
- 22.4. We will never accept sexual harassment or violence. We will endeavour to work with victims and wider safeguarding partners to take action to stop it.
- 22.5. Teachers and others working in schools are in positions of trust so it is vital that we all play a part in supporting those who may have been subjected to sexual harassment or violence, but also that we do not do anything which would undermine our own duty to safeguard and promote the welfare of those children and young people in our care.

#### Sexual Harassment

- 22.6. Sexual harassment is unwanted conduct of a sexual nature. It can apply to anyone regardless of their identified sex, gender or sexual orientation. It can include:
  - 22.6.1. comments such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
  - 22.6.2. jokes of a sexual nature or taunting somebody in a sexual way;
  - 22.6.3. engaging in unwanted behaviour such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature;
  - 22.6.4. online sexual harassment by sharing sexual images and videos without consent, messages of a sexualised nature, bullying comments, comments on social media platforms or being exploited in a sexualised way with coercion or threats against the person.

#### Sexual violence

- 22.7. Sexual violence includes the offences which are created under the law to deter and hold accountable those who engage in prohibited activity. They are some of the most serious acts which our society has put in measures to address. We want to be clear here with everybody what these acts of sexual violence are and to be able to enable you to recognise when you should raise these with a trusted adult:
  - 22.7.1. 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.
  - 22.7.2. Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything

else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

22.7.3. 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.

#### Consent

22.8. 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.

22.9. 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.

22.10. 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.

22.11. 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.

#### Who can engage in sexual harassment or violence

22.12. Anyone can engage in sexual harassment or violence including fellow pupils, students and adults.

22.13. If you feel that you are being, or have been, subjected to sexual harassment or violence you should feel able and safe to speak with a trusted adult here at school.

22.14. If you want to speak, we are here to listen and help. At school, you have the following ways in which you can speak about your experiences and be heard:

By contacting; [benterk@baylearningtrust.com](mailto:benterk@baylearningtrust.com) or [foxj@baylearningtrust.com](mailto:foxj@baylearningtrust.com)

#### Awareness

22.15. In addition to this section we will work with our school community to raise awareness of unacceptable and unwanted conduct, violence and the importance of consent. We will do this:

22.15.1. By contacting; [benterk@baylearningtrust.com](mailto:benterk@baylearningtrust.com) or [foxj@baylearningtrust.com](mailto:foxj@baylearningtrust.com)

### 23. Female mutilation/ female genital mutilation

23.1. FGM involves cutting, and sometimes sewing the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female

circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation.

- 23.2. The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen and Iraq.
- 23.3. The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is still legal. **Professionals have a mandatory duty to report such offences to the police.**
- 23.4. The indicators of FGM may initially mirror those of sexual abuse. You may notice, for example, that a girl or young woman shows signs of pain or discomfort, needs to visit the toilet constantly, has vaginal blood loss or is unable to sit comfortably. She may make excuses to avoid PE and other physical activity or refuse to use the **Trust's** showers. She may also become evasive or fearful if you enquire if she is unwell, and assure you that she is fine when she clearly is not. If she is a BME child, has recently arrived back from a 'holiday' abroad or a period of absence from the **Trust**, seems to be in pain and has not been taken by her family to see a doctor, you should consider FGM, alongside other possible explanations.
- 23.5. Breast ironing (also known as breast flattening) is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or to disappear. Usually carried out by mothers on their daughters to protect them from rape and sexual harassment. In certain African cultures men believe that as soon as a girl has breasts she is ready to have sexual relationships. There have been incidents of this happening in the UK, you may notice an unwillingness to get changed for PE, pain when moving, or a flattened breast area.

## 24. Forced marriage

- 24.1. Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse. 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.
- 24.2. Once again, 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 to an employee. 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.
- 24.3. These young women may also become victims of what is termed honour-based violence. Forced marriage, here or abroad, is a crime; the **Trust** will always report to both police and Local Authority. Employees and the designated safeguarding lead can also consult the Forced

Marriage Unit ([fmufcdo.gov.uk](mailto:fmufcdo.gov.uk)) who provide support to professionals dealing with forced marriage cases and individuals at risk or subject to forced marriage.

## 25. Honour based violence (“HBV”)

- 25.1. ‘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.
- 25.2. 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.
- 25.3. 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.
- 25.4. Signs:
  - 25.4.1. withdrawal of student from the **Trust** by those with parental responsibility;
  - 25.4.2. pupil being prevented from attending higher education;
  - 25.4.3. truancy or persistent absences;
  - 25.4.4. request for extended leave or pupil not returning from an overseas visit;
  - 25.4.5. surveillance by siblings/cousins/extended family members at the **Trust**;
  - 25.4.6. decline in behaviour, engagement, performance or punctuality, poor exam results. – in particular for previously motivated pupil; or
  - 25.4.7. decline in physical presentation or demeanour.

## 26. Radicalisation/PREVENT

- 26.1. Appendix A included in this policy outlines the overall approach to PREVENT Safeguarding. The Counter Terrorism and Security Act 2015 places a duty on specified authorities, which includes **Trusts**, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). Possible Channel referrals will be discussed by the **Trust** Safeguarding Team, if appropriate, and in accordance with government guidelines. **Trust** employees have a statutory duty to inform the Designated Safeguarding Lead should they have any concerns.

## **27. Honour based violence lesbian, gay, bisexual and transgender (LGBT)**

27.1. The **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 **Trust** community feels valued, irrespective of their sexual/gender orientation, race or religion.

27.2. Diversity is celebrated and valued at the **Trust**.

## **28. County Lines**

28.1. The **Trust** is mindful of the impact of gangs and fringe membership, particularly on our most vulnerable pupils.

28.2. Children can be trapped through being indebted to those involved in trafficking of drugs or other gang activity. Coercion and threats can be used to force children to:

28.2.1. carry and sell drugs;

28.2.2. working in drug factories and farms;

28.2.3. carry weapons; and

28.2.4. skip school to assist with criminal activity or due to having been out late.

28.3. Each gender will have different experiences of CCE, with girls being exposed to an increased risk of sexual exploitation.

28.4. For county lines, the following are potential indicators:

28.4.1. going missing and being found in areas away from home;

28.4.2. having been the victim or perpetrator of serious violence;

28.4.3. second phone or increased and secretive activity with a communication device;

28.4.4. being exposed to 'plugging' through which drugs are concealed internally on the body;

28.4.5. being found or associated with property or accommodation they have no real link to including hotels/hostels;

28.4.6. owe a debt bond to their exploiter; and

28.4.7. increased bank account activity without real explanation.

## **29. Trans pupils and gender identity**

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

- 29.2. 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.
- 29.3. 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.
- 29.4. The **Trust** will endeavour to support families during this time, but the welfare and safety of the pupil will always come first.
- 29.5. Advice and assistance will be provided and sign posted to organisations such as Mermaids.
- 29.6. 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.

### 30. **Other vulnerable pupils**

- 30.1. Members of the Safeguarding Team are often aware of pupils who are vulnerable for other reasons.
- 30.2. It is the Safeguarding Team's responsibility to ensure that these pupils receive support either from a teacher in the **Trust** to whom the pupil relates or from an external agency. The pupil's head of year 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 the **Trust's** sixth form. Parents/carers are informed of the situation wherever appropriate.

### 31. **Data protection and information sharing**

- 31.1. It is vital that information is shared in child protection and safeguarding matters in a timely manner
- 31.2. The law on data protection changed in 2018 with the implementation of the United Kingdom General Data Protection Regulation and Data Protection Act 2018 but it does not prevent the sharing of information between practitioners involved in keeping children safe.
- 31.3. 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:
- 31.3.1. the information shared is necessary for the practitioners involved to properly participate in the protection and safeguarding of the individual concerned;
  - 31.3.2. it will be shared by secure means of communication to protect the rights of the individual;
  - 31.3.3. 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

31.3.4. 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.

31.3.5.

## **32. Other Trust policies**

32.1. This policy needs to be read in conjunction with other policies, in particular:

32.1.1. Behaviour Policy;

32.1.2. Equality Policy;

32.1.3. RSE and Health policy;

32.1.4. Safer Recruitment Policy;

32.1.5. Managing Allegations Policy;

32.1.6. Staff Code of Conduct.

## The Bay Learning Trust

### CHILD PROTECTION POLICY

#### Appendix A

#### **PREVENT Safeguarding Objectives**

- 1.1. Within this overall framework the Prevent strategy will specifically:
  - 1.1.1. respond to the ideological challenge of terrorism and the threat we face from those who promote it;
  - 1.1.2. prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
  - 1.1.3. work with sectors and institutions where there are risks of radicalisation which we need to address.
- 1.2. **Trusts** can help to protect children from extremist and violent views in the same ways that they help to **safeguard children** from drugs, gang violence or alcohol.
- 1.3. The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and the **Trust's** values. Awareness of PREVENT and the risks it is intended to address are both vital. Employees can help to identify, and to refer to the relevant agencies, children whose behaviour suggests that they are being drawn into terrorism or extremism.
- 1.4. **Trusts** of all kinds can play a role in enabling young people to explore issues like terrorism and the wider use of violence in a considered and informed way. **Trusts** can facilitate understanding of wider issues within the context of learning about the values on which our society is founded and our system of democratic government. These are important for reasons which go far beyond PREVENT but they connect to the PREVENT agenda.
- 1.5. Early intervention is available subject to an approved application through Channel. Such referrals can only be made with the consent of the pupil/parents involved.

PREVENT referrals should be reported in line with other safeguarding procedures.