SAFEGUARDING POLICY: CHILD (UNDER 18) SAFEGUARDING

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POLICY STATEMENT

1.1   The Royal Academy of Music's mission is to provide musical training of the highest national and international standards, and to ensure that members of its community are able to learn and flourish in a safe and supportive environment.

1.2   The Academy recognises that the welfare of children is paramount and takes seriously its statutory duty and moral responsibility to ensure that, in all its activities and functions, robust measures exist to safeguard children and to protect them from harm and/or abuse.

1.3   The Academy is committed to meeting its child safeguarding duties and responsibilities under legislation and guidance within the Academy and through its activities.

1.4   The Academy aims to maintain a safe and supportive environment for staff in order to safeguard and promote the welfare of children. In furtherance of its child safeguarding duties, anybody who identifies or encounters child safeguarding concerns in the context of their work on behalf of the Academy will be supported when they report their concerns in good faith.

1.5   This policy and these procedures, relate to the safeguarding and welfare of children as defined by the Children's Act 1989: a person under the age of 18[1].

1.6   The Academy is committed to shaping contemporary music for its students through personalised direct tutelage. Therefore, interaction with children may take place in a range of scenarios including:

- one-to-one, group and class-based teaching
- outreach activities and projects
- music tours and residential activities
- open days at the Academy
- concerts or performance opportunities

1.7   The Academy acknowledges that staff have a crucial role to play in identifying concerns and indicators of possible child abuse, neglect or exploitation at an early stage in order to address safeguarding risk. This includes where children partake in Academy activities both on and off site. In the event of any music tours or residential activities, additional risk assessments and a safeguarding strategy must be completed at the earliest stage as part of the activity planning.

1.8   The Academy is committed to the care, respect and dignity of all children regardless of age, disability, sex, race, religion, belief or lack of, sexual orientation, identity, gender reassignment or pregnancy, believing each individual has the right to equal protection from all types of harm or abuse.

1.9   This policy and these procedures apply to all staff in any capacity: teaching, academic, administrative, mentors, volunteers, and other roles such as external freelance workers, contractors, visiting artists, students, visitors, and anyone working within or on behalf of the Academy. Therefore, any reference made to 'staff' within this policy is in reference to anyone acting in this broad capacity.

1.10   The purpose of this document is:
- To ensure all staff are clear about their responsibilities to identify and respond to child safeguarding and welfare concerns in line with government guidance.

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[1] Section 105, Children Act 1989

- To ensure all staff understand the importance of prevention and responding proactively and efficiently to all concerns.
- To outline the process for staff and students to report any form of abuse, neglect or exploitation and know that their concern will be treated seriously.
- To provide information on the responsibilities of, and approach taken by, the Academy in the safeguarding and protection of children for students attending the Academy and/or participating in its activities.

1.11 Students and staff are made aware of this policy and these procedures during their induction or through information widely distributed and provided by the Academy.

1.12 All Academy staff should adhere to the procedures and Academy Code of Practice (CoP) within this policy in relation to the safeguarding of children.

1.13 Information relating to any concern, allegation or disclosure **must** be referred and recorded as soon as possible. These procedures outline the actions that must be taken, information to be recorded and the processes and timescales for doing so in a timely manner.

For other related safeguarding policies, procedures and guidance please see: Academy Code of Conduct, Privacy Policy, Whistle Blowing Policy and Junior Academy Safeguarding, Policy and Procedures, Junior Academy Privacy Notice as well as internal HR policies.

DEFINING SAFEGUARDING AND CHILD PROTECTION

1.14 Safeguarding and promoting the welfare of children is everyone's responsibility and everyone who comes into contact with children has a role to play.

1.15 Safeguarding and promoting the welfare of children are defined[2] as:

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

1.16 Definitions:

- **Child or children** refers to anyone under the age of 18.
- **Staff** refers to anyone involved in Academy activities both on and off site.
- **Safeguarding children** is the action taken to promote the welfare of children and protect them from harm.
- **Child protection** is the action taken to protect specific children who are suffering, or likely to suffer, serious harm.
- **Harm** relates to ill treatment, impairment of physical or mental health and impairment of physical intellectual, emotional, social or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment for example in a domestic situation)[3].
- **Abuse** is a form of maltreatment of a child and includes inflicting harm, neglect, exploitation and can also be not preventing harm.

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[2] Working Together to Safeguard Children 2023: A guide to inter-agency working to safeguard & promote the welfare of children

[3] As defined by Section 31, Children Act 1989 and section 3, Domestic Abuse Act 2021

1.17   It is recognised that children may be abused by an adult or adults, or another child or children of any gender. Child abuse can include acts or failure to act that causes physical, emotional/psychological and/or sexual harm. Child abuse can be committed in person as well as online or via technological means.

1.18   Types of child abuse:

- **Physical abuse**: inflicting physical harm and/or injury; this includes making up symptoms of an illness or causing a child to become unwell.
- **Emotional abuse**: involves the emotional mistreatment of a child and can also be referred to as psychological abuse. It can involve deliberately trying to scare, humiliate, isolate or ignore a child.
- **Sexual abuse**: when a child is forced or manipulated into engaging in sexual activity, which can take place both in person or online. In certain situations, child sexual abuse can take place between the ages of 16 and 18 even where consent is believed to have been given, including, an abuse of position by an adult and child sexual exploitation.
- **Neglect**: involves the ongoing and/or persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect can take four forms:
    - **Physical neglect:** basic needs including food, shelter, clothing, supervision or keeping the child safe or protecting them from harm.
    - **Educational neglect:** failure to provide access to education
    - **Emotional neglect:** not providing nurture or stimulation: ignoring, humiliating, intimidating or isolating the child.
    - **Medical neglect:** failure to provide or access health care including medical or dental care and includes ignoring medical advice.
- **Domestic abuse** can take many forms: physical or sexual, violent or threatening, controlling or coercive, economic, psychological, emotional or other abuse. Exposing a child to domestic abuse both inside or outside the home is also considered child abuse. This includes the child seeing, hearing or experiencing abuse[4].
- **Grooming and child exploitation** is where an individual or group builds a relationship of trust and connection with a child in order to abuse, exploit or manipulate them. This can be intended to enable or result in other forms of child abuse taking including child exploitation and radicalisation.
- **Radicalisation** is a form of grooming and exploitation where a child is encouraged to develop extreme views or beliefs in support of terror. It may take place in families, in communities, through friendship groups or by strangers forming an exploitative relationship with a child. Children may be exposed to extremist content online or via social media.
  The Academy takes seriously its duty and responsibilities under **Prevent**, which is embedded within its safeguarding, welfare and student support approach.
- **Child sexual exploitation** (CSE) is a form of sexual abuse and occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. Sexual exploitation can occur in person (even where sexual activity appears consensual) and online/through the use of technology.
- **Child criminal exploitation** (CCE) occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into criminal activity. This abuse is most commonly seen in gang and county line activity and involves recruitment of children into the commission of criminal acts.
- **Bullying and harassment** can take place in person and/or online (cyber-bullying). Bullying is the repeated behaviour by an individual or group that intentionally hurts another individual or group either physically or emotionally. Harassment is unwanted, unreasonable and/or offensive conduct which adversely affects a person's dignity or wellbeing and creates an intimidating,

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[4] Section 3, Children as victims of domestic abuse, Domestic Abuse Act 2021

hostile, concerning or humiliating environment. Harassment on the grounds of gender, race, disability, age, sexuality, religion or belief is unlawful under Equality and Diversity legislation. Harassment can be direct or indirect and may constitute a criminal offence.

- **Female genital mutilation** is where a female's genitals are deliberately altered or removed for non-medical reasons. The child may be taken out of the UK for the procedure to be carried out. This a form of child abuse and is a criminal offence.
- **Child-on-Child abuse**: it is recognised that abuse can be perpetrated by another child or children of any age or gender. This abuse, which takes different forms, can take place in person as well as online or via technology.

1.19   Staff should familiarise themselves with Appendix 2 for further information about child abuse.

LEGAL FRAMEWORK AND STATUTORY GUIDANCE

This policy and these procedures have been informed and developed with reference to statutory guidance 'Keeping Children Safe in Education 2023'. The Academy has adopted this guidance as best practice in recognition that, although it does not fall within the definition of the given institutions, the principles of this guidance are applicable within the Academy context in relation to safeguarding children.

In addition, the safeguarding approach of the Academy, is underpinned by a range of legislative frameworks and guidance. These help to identify the paramountcy of the child welfare in line with the following legislation and statutory guidance:

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Equality Act 2010
- Human Rights Act 1989
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education Guidance 2024 (KCSIE)
- Sexual Offences Act 2003
- Domestic Abuse Act 2021 (section 3 Children as victims of domestic abuse)
- Data Protection Act 2018 and General Data Protection Regulations (GDPR)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018
- Safeguarding and Protecting People for Charities and Trustees 2021
- Keeping children safe in out-of-school settings Code of Practice 2021

1.20   Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.

1.21   Working Together to Safeguard Children (2018) is statutory guidance which lays out the duties under Section 11. It provides a guide for all organisations on the arrangements and processes which should be in place to safeguard children, including paid and volunteer staff. Further information is contained in Working Together 2018 and guidance is also provided by the NSPCC.

1.22   The following outlines the core roles and responsibilities in relation to the Academy's safeguarding and child protection procedures.

2.   ROLES AND RESPONSIBILITIES

2.1   It is the responsibility of the **Governing Body** to:

- Make strategic decisions about risk management, the organisation's activities and have overall responsibility for the safeguarding of children.
- Maintain strategic leadership and oversight in relation to safeguarding and child protection in the Academy.
- Appoint a nominated individual to provide a leadership responsibility for child safeguarding arrangements.
- Ensure staff receive the safeguarding and child protection training at induction and updated regularly.
- Ensure that safeguarding and child protection are at the forefront of process and policy development to promote child welfare, and that the processes operate with the best interests of children at their heart.
- Appoint a senior member of staff with the status and authority within the Academy, to the role of designated safeguarding lead (DSO).
- Ensure that staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR.

2.2   It is the responsibility of the **Principal** to:

- Ensure that there are policies and procedures in place to enable action to be taken in a timely manner to safeguard and promote child welfare. Ensure annual policy review.
- Communicate to staff any changes in policy and procedures.
- With HR and DSL, ensure staff undergo safeguarding and child protection training (including online) at induction. That staff receive updates, at least annually, and continue to provide them with relevant changes.
- Evaluate the effectiveness of safeguarding within the organisation annually and update if needed.
- Review, update and develop the Academy's policy and procedures on safeguarding in line with statutory and relevant child protection guidance.
- Promote the importance of safeguarding across the organisation.
- Make decisions about appointing someone who has a criminal record.
- Ensure that the organisation meets its statutory and legal requirements in relation to safeguarding and child protection.

2.3   **Designated Safeguarding Lead (DSL).** The DSL for the Academy is the Dean of Students, whose responsibility it is to:

- Take overall responsibility for the implementation of safeguarding practices, procedures and delivery of child protection activities including policy updates and decision making.
- Is the point of contact for the designated safeguarding officers (DSO) about child safeguarding and welfare concerns.
- Keep relevant senior staff within the Academy informed about any incidents, action taken and any further action required.
- Ensure that a case protection record is opened and outlines the details of the concern, decisions made, and actions taken, liaison with other agencies and outcome.
- Advise the organisation of child protection training needs.
- Oversee the post-incident action plan and any ongoing child protection activities.
- Collate monitoring data on safeguarding activities.
- Update the organisations policy and procedures on safeguarding.

- Ensure Governing Body and the Principal are informed about complaints or allegations about staff that may meet the harm threshold and advise on safeguarding actions.

- Ensure staff, visitors and other relevant parties including contractors comply with safeguarding best practice in undertaking their duties.
- Maintain links with the Local Safeguarding Children's Board (or LADO) to ensure local procedures are adopted, kept up-to-date and to become more effective in safeguarding children at a strategic level.

On Saturdays, the nominated deputy DSL onsite is the Director of Junior Academy who is a trained DSO. They are responsible for reviewing and managing safeguarding and child protection concerns and then report any incidents or concerns to the Dean of Students.

2.4   **Designated Safeguarding Officers (DSO)** at the Academy are responsible for:

- Being the first point of contact for staff who are concerned about the safeguarding and welfare of a child.
- Providing information and advice on safeguarding within the Academy.
- Being aware of government guidance on safeguarding and child protection.
- Making a referral to the relevant authorities following safeguarding incidents.
- Ensuring sufficient information is available when making a referral to local authority child social care and that a referral is made within one working day and confirmed in writing within two working days.
- Ensuring an accurate record of concerns and actions taken has been made.
- Informing the DSL who will maintain oversight and keep the governors informed whenever concerns arise about a child so that a decision can be made as to what action to take.
- Ensuring students, visitors, teachers and staff are aware of the Academy's safeguarding policy and procedures.
- Maintaining links with the local authority to ensure local procedures are adopted, keep-up-to date with changes and become more effective in safeguarding children at an operational level.

2.5   **All staff** have a responsibility:

- To provide a safe environment in which children can learn, which includes identifying and responding to safeguarding and welfare concerns.
- Know who the designated DSL and DSOs are and how to contact them. See Appendix 4 for contact details.
- Be prepared to identify children who may benefit from early help, known the process and their role within it.
- Exercise professional curiosity to support the early identification of abuse, neglect and exploitation in children who may be in need of help or protection.
- To be familiar with the Academy's safeguarding policies and child protection procedures.
- To maintain an attitude of '**it could happen here**' where safeguarding is concerned and act in the **best interests** of the child.
- To be aware of indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside the Academy, at home and online.
- To take action immediately when a concern arises and follow the Academy's child protection procedures. See Appendix 2 for flow chart.
- To report the concern immediately to a DSO named in this policy, who will determine the next steps to take. Staff should be prepared to make a referral to the relevant local authority and provide further information.
- To be aware that technology is a significant component in many safeguarding and wellbeing issues.

- To record concerns and any actions taken (as soon as practicable and within 24 hours) and report this to a DSO or DSL. Information that **must** be recorded and reported include (further guidance is also outlined within this document):
  - The nature of the allegation or concern
  - A description of any visible bruising or injuries, other visible signs or other indicators of abuse, neglect or exploitation
  - The voice of the child: the child's account about what happened, in whatever way they are able to provide it
  - Any times, dates, or other relevant information including location, witnesses and parties involved
  - Whether the parent, carer, child is aware of the concern
  - The viewpoint of the child in relation to any sharing of information (mindful that confidentiality should never be promised)

2.6   Staff should not assume that a colleague, or another professional will take action and share information that might be critical in keeping children safe. Early information sharing is vital for the effective identification, assessment, and allocation of service provision[5].

2.7   The Data Protection Act 2018 and UK GDPR **do not** prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the DSL or a DSO. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children[6].

2.8   Staff are not responsible for determining whether or not abuse has taken place. It is vital to adopt a non-judgemental approach and raise any concerns to a DSO or DSL at the earliest opportunity.

2.9   In all cases, if staff are unsure, they should speak to the DSL or a DSO.

2.10   **Early Help**:

Any child may benefit from early help. All staff should be aware of the local authority **Early Help** process[7] and how to identify children who may benefit from this. Staff should also be alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves

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[5] Keeping Children Safe in Education 2023
[6] Keeping Children Safe in Education 2023
[7] Link to the Westminster Early Help process. Contact should be made with the local authority where the child resides if known.

- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

2.11 Safeguarding Issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and or/persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Absent or missing children: it is recognised that a child who is absent or missing from education may indicate a vulnerability or risk of harm. Any child who does not sign into the Academy for an under-18 activity for which they are expected must be brought to the attention of the DSO or DSL.

Further information and definitions of safeguarding issues can be found in Appendix 2 and Keeping Children Safe in Education 2023.

For Academy DSO and DSL contact details see Appendix 4.

CHILD PROTECTION PROCEDURES

2.12 Disclosure of abuse, neglect and exploitation

Children and young people may disclose abuse in different ways. They may not always be aware that they are disclosing abuse through their actions and/or behaviours. Some children may make partial disclosures and may withhold information due to factors including vulnerabilities or barriers to disclosure including:

- Fear they will get into trouble or upset the family.
- Feel embarrassed, humiliated, ashamed or guilty.
- This could also be due to their vulnerability due to disability, sexual orientation, language barriers.

2.13 Types of disclosure and how concerns may arise

- **Direct disclosure:** The child or young person may tell you directly about something that has happened to them. They may do this verbally or non-verbally through writing letters or digital reports, drawing pictures or communicating in other ways.
- **Indirect disclosure:** They may make ambiguous verbal statements which suggest something is wrong. The disclosure could be via another child or adult.
- **Behaviour of child:** A child may display behaviours that indicates something is wrong (this may or may not be deliberate). There may be visible signs of abuse, neglect and exploitation including injuries for which there appears to be no satisfactory explanation.
- **Behaviour of adult:** The observed behaviour or attitude of a member of staff or another adult towards a child may concern you and could indicate abuse, neglect and exploitation is taking place.

2.14 Process for managing disclosures

The following four-step process should be followed:

- **Recognise** signs and indicators of abuse and/or neglect
- **Respond** to safeguarding and welfare concerns
- **Refer** concerns
- **Record** concerns, actions and outcomes.

2.15 Recognising signs and indicators of abuse and/or neglect

Early identification of signs and indications of abuse is key to safeguarding and keeping children safe. Staff should familiarise themselves with the **NSPCC guidance: Definitions and signs of child abuse guidance for professionals**.

2.16 Responding to safeguarding and welfare concerns

All staff must know what to do if a child tells them that they are being abused, or signs and indicators of abuse are identified. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and promote welfare.

Staff **must**:
- Listen to the child with patience and without judgement.
- Reassure them that they are being taken seriously and will be supported and kept safe.
- Maintain an appropriate level of confidentiality, which means only involving those who need to be involved to keep the child safe such as the DSL/DSOs, Local Authority and Police.
- Never promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the interests of the child.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation, ethnicity or language barriers.
- Maintain professional curiosity and speak to a DSO or the DSL if there are any concerns about a child or an adult working with a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- Do not confront the alleged abuser.

Who:
- It is most likely that a disclosure will be made to a person who the child trusts and in a place where they feel safe. **This could be anyone and anywhere**.
- It is important that the person the child has put their trust in recognises this and the child has put them into a position of trust.
- They should be supportive and respectful of this position and may be required to remain involved in the ongoing support of the child.
- Best practice should involve speaking to the child with another member of staff present and will enable that person to keep notes about what has been disclosed. One of these should preferably be the DSL or a DSO.

What:
- Staff should be aware that abuse may take many forms and also the perpetrator of abuse may be known or unknown, adult or child.
- It is important not to draw conclusions, presume details or make assumptions about the information provided during disclosure.
- All types of abuse should be treated with equally seriousness and should not be downplayed.
- The initial disclosure may be the first incident they have spoken about, rather than being representative of a singular incident as trauma can impact memory.

When:
- A disclosure can take place at **any time**, so it may be necessary to reorganise planned timetables to enable that a response is taken immediately.
- A conversation with the child should take place as soon after the disclosure is made or a concern identified.
- There should also be sufficient time for the conversation to take place.
- They should not be given the impression or made to feel they have created a problem by reporting abuse.

Where:
- It is important to ensure that a conversation with the child takes place in an suitable location in order to maintain confidentiality.
- This should ideally be away from other adults or children, somewhere that they feel safe to speak and will not be overheard and does not put them at further risk through disclosure.
- This should not be somewhere that puts a staff member in potential breach of this policy and these procedures; the safety of the child is paramount, and a conversation should not be delayed due to insufficient staffing or suitable space.

How:
- Listen carefully to the child with patience and focus.
- Stay calm and show them that they have your full attention.
- Maintain a non-judgemental approach – it's not your responsibility to determine whether abuse has taken place or not.
- Reassure them that they are being taken seriously and they will be supported and kept safe.
- Tell them that they have done the right thing by telling you.
- Use open questions - **what, where, when, who, how -** to clarify understanding or ask for further information – open questions are those that do not result in a yes or no answer.
- Allow the child to speak at their own pace and avoid filling in the gaps or pre-empting what the child will say.
- Use encouragers, these can be verbal or non-verbal such as "go on", by nodding or even using silence.
- Outline to the child when necessary or at a suitable time that confidentiality cannot be promised and it is likely that the concern will be shared further.
- Ensure the child understands the reason why information will be shared is to keep them safe.
- Reassure the child as they may fear that the information will be passed onto their abuser.
- Mirror the child's words and reflect what they have said back using their own language to seek clarification.
- Do not ask a child 'why' something happened as this may make them feel like they are to blame or is asking them to speak about the motivations of the abuser.
- Leading questions (questions that push the child to respond in a particular way) should be avoided but in certain circumstances may be necessary. For example, to ask the child if they have been harmed and what the nature of the harm was. It is important not to presume the nature of the harm in the question.
- Tell the child what will happen next including who will be informed and the reason for this. Depending on the nature of the harm and immediacy of action taken it may be necessary to inform the local authority and/or police. The child should be supported and reassured throughout this process.

See Appendix 2 for flow-chart

REFERRING CONCERNS

2.17   Disclosures and concerns of child abuse must be reported as soon as possible. A DSO or the DSL must be informed as soon as possible if they are not involved in the initial report.

2.18   The child's wishes in terms of how they want to proceed should be taken into consideration. They should be given as much control as possible over decisions relating to the information they have shared and support that they will be offered. This will need to be balanced with the duty and responsibility to protect other children.

2.19   **Report to local authority**: Referrals to the Local Authority children's social care should be made where child is suffering or is likely to suffer from harm. This must be done in consultation with a DSO and/or DSL, but in emergency situations should not be delayed.

2.20   **Early help**: depending on the circumstances, it may be in the best interests of the child to manage concerns internally or support the child through a referral for early help. Early help can also involve a multi-agency approach with other professionals.

2.21   The Academy's response at any stage is underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment; it is never acceptable and will not be tolerated.

2.22   **Report to police**: any report to police will be in parallel with local authority children's social care. Staff should follow the guidance outlined in '**when to call the police'**. The DSL or DSO must be informed as soon as possible. Staff should also be aware that they may be required to be involved in some capacity during any subsequent investigation or multi-agency meeting.

3.   RECORDING CONCERNS

3.1   All concerns, discussions and decisions made in relation to safeguarding and child protection, including the reasons for those decisions, should be recorded in writing at the earliest opportunity.

3.2   Staff should be aware that these records may be requested and disclosed as part of a local authority or police investigation as well as responding to complaints about the way a case has been handled.

3.3   Information should be kept confidential and stored securely. It is best practice to keep concerns and referrals in a separate child protection file for each child.

3.4   Records should include:

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

3.5   Consider the best way to make a record of the report. Best practice is to wait until the end of the disclosure and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and listen to what they are saying. It may be necessary to make notes during the report (especially if a second member of staff is present). However, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made** at the time or soon after the disclosure.

3.6   It is important to only record the facts as the child presents them using the child's own words and not the personal opinions of the note taker.

3.7   When taking notes they should contain:

- The child's account in their own words,

- Any questions asked by the staff member and the child's response,
- Times, dates, locations, details of the alleged persons involved, any witnesses or digital evidence.

3.8   Speak to and pass the written record to the DSO, unless they are already a party to the disclosure, who will discuss what action should be taken next.

3.9   Further events/incidents/disclosures about the same child should also be recorded and shared in the same way.

3.10   A child protection file should be opened by the DSO or DSL for each child when a concern is raised. This should be kept confidential, stored securely and only accessible to those who need to see it. This should be in line with the requirements of the Data Protection Act 2018 (DPA) and UK GDPR.

3.11   Any request for data by another organisation relating to a child protection issue must be brought to the attention of the DSL. Any decision should be recorded and stored in the relevant child protection file.

4.   CONFIDENTIALITY

- Staff should maintain an appropriate level of confidentiality. Information must only be shared with those who need it in order to safeguard and promote the welfare and protect the safety of children. (See also data principles and information sharing)
- Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.
- It may be necessary to seek advice and guidance from a DSO or the DSL as well as investigative agencies.
- Any subsequent events/incidents relating to the child must also be recorded and shared following the best practice outlined in this policy.

If in doubt about record keeping, staff should discuss with the DSL or a DSO.

DATA PRINCIPLES AND INFORMATION SHARING

4.1   The principles of the Data Protection Act 2018 (DPA) and UK GDPR must be followed when handling personal information. Personal data will be handled in line with the Academy's Privacy Policy. Additional information is available here **Data protection in schools - Guidance** (DfE, 2024b).

The seven principles of the UK GDPR are:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

4.2   The DPA and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. The DPA includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information **without consent**.

4.3   Information, which is relevant to safeguarding, will often be categorised as sensitive and personal. It must be stored securely and remain confidential. Disclosure of the information must be necessary for the purpose for which it is being shared and limited to only those individuals who need it.

4.4   It is important to be open and honest with the child as early as possible about any information that could be shared, the reason why and with whom it may be shared unless it is unsafe or inappropriate to do so.

4.5   It is best practice to obtain consent from the child and/or parent/guardian (if this does not put the child at risk of further harm in the circumstances), or staff members, before any personal information relating to them is shared. However, the Academy will not seek consent to share information in every situation if there is a lawful basis to do so and the safety of a child or another is at risk, or it would cause an unjustified delay or prejudice the prevention, detection or prosecution of a crime.

4.6   If there is any doubt about the sharing of information, advice should always be sought from an experienced practitioner such a DSO or DSL, local authority children's social care, or the **NSPCC helpline.**

4.7   The sharing of information must be necessary, proportionate, relevant, adequate, accurate, timely and secure. A record must also be kept of the decision and reason for sharing or not sharing the information. The record should also specify the information shared, with whom and for what purpose. It must also be stored securely.

4.8   In all cases where information is shared the following information must be recorded:

- Date and time
- **What** information shared
- **Why** the information is being shared
- **How** it has been shared and whether there has been receipt
- **With whom** the information is shared
- Whether the information is shared with or without consent and rational
- If sharing information without consent, whether the child or family have been informed and decision-making rationale

Further guidance can be found in **Information Sharing for Safeguarding Professionals.**

SAFEGUARDING CONCERNS OR ALLEGATIONS ABOUT ANY MEMBER OF STAFF INCLUDING VOLUNTEERS, TEACHERS AND VISITING STAFF

4.9   Child abuse can occur outside the family environment including within schools, organisations and other settings including the Academy. Child abuse can be perpetrated by anyone who comes into contact with a child including staff members, volunteers and visiting staff.

4.10   It is crucial that everyone maintains an **'it could happen here'** approach to safeguarding concerns and allegations including those made about staff members. All allegations (current or historical) are taken seriously, and action is taken in the circumstances and with regard to the level of concern or allegation. When dealing with any allegation against staff it is vital to keep the safety and welfare of children as the central concern.

4.11   All concerns or allegations relating to a staff member, volunteer, teacher and visiting staff will initially be assessed in relation to the following criteria. This assessment must be carried out in consultation with the DSL and approach taken with reference to Keeping Children Safe in Education 2023:

- Concerns or allegations that **may** meet the harm threshold.
- Concerns or allegations that **do not** meet the harm threshold (referred to in this policy as in the statutory guidance as 'low-level concerns')

See Appendix 3 flow-chart

CONCERNS OR ALLEGATIONS THAT MAY MEET THE HARM THRESHOLD

4.12 This part of the policy relates to managing concerns or allegations that might indicate a person may pose a risk of harm.[8]

4.13 These procedures about how to manage cases of allegations or concerns about a member of staff or volunteer within the Academy, should be used in respect of all cases in which it is alleged that a staff member has:

- behaved in a way that has harmed a child or may have harmed a child, and/or
- possibly committed a criminal offence against, or related to, a child, and/or
- behaved towards a child in a way that indicates they are unsuitable to work with children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that happened outside the Academy that might make an individual unsuitable to work with children)

4.14 In any circumstances:

- **The welfare of the child is paramount** – the DSO and/or DSL must be informed and ensure that the child is not at risk. The DSO/DSL is responsible for ensuring that suspected abuse is reported to the local authority as previously described.
- The DSL will appoint a case manager, to liaise with the local authority and other agencies where necessary to determine next steps including immediate protective actions including informing parents/guardian.
- The case manager, in consultation with the LADO, HR and other agencies, will conduct an investigation to determine the facts and identify further enquiries.
- A police and local authority investigation will usually take place prior to any disciplinary process. An investigation and disciplinary process will only take place following the conclusion of an external investigation or with external authorisation and in line with Academy Discipline & Appeal Policy.
- Under no circumstances should the accused or their colleagues make contact with or try to retaliate against those that have raised the concern or those involved in the investigation. If this is suspected or found to be taking place then the Academy's disciplinary processes will be evoked.
- If an allegation has been made against a staff member they will be supported, and the case manager or HR will keep the member of staff informed of the progress of the case.

4.15 **Position of trust** is a legal term that refers to certain roles where adults have contact with children and includes those in a teaching capacity. It is an offence for any person aged 18 or over, who is in a 'position of trust', to have a sexual relationship with a child or young person, even if that child is over the age of consent (16 or over). It is an offence, if an adult (18 years or older) engages in sexual

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[8] **Harm test – Disclosure** and Barring service Guidance: Making barring referrals to the DBS. and Section 31(9) of the Children Act 1989 as amended by the Adoption and Children Act 2002.

activity with a child (under 18 years) and is in a position of trust in relation to that child with reasonable knowledge that they are in a position of trust.

4.16   All staff must recognise the responsibility they have to ensure that they do not abuse or exploit their position of trust. The Ethics and Conduct Policy sets out that staff must not form personal and/or sexual relationships with students.

CONCERNS OR ALLEGATIONS THAT DO NOT MEET THE HARM THRESHOLD

4.17   The Academy wants to create a culture where all concerns about adults can be shared responsibly, recorded and dealt with appropriately. A 'low-level' concern is any concern that creates unease or a nagging doubt.

4.18   A concern may relate to behaviour, no matter how small, that indicates that an adult working with children in or on behalf of the Academy may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

4.19   Staff, students, parents/guardians and other parties can report low-level concerns via the **Report + Support** site or directly to a DSO or the DSL.

4.20   **Poor practice** (reference should also be made to the Codes of Practice). Low-level concerns may relate to poor practice rather than child abuse. Where there is any doubt, a DSO or the DSL should be consulted. If any review of a concern or investigation shows that the allegation is clearly about poor practice then the Academy will determine how best to remedy this within the disciplinary process.

4.21   **Safeguarding concerns outside the Academy/offsite**. If you are concerned about an incident which has occurred outside of the Academy, or at a different site, this should be raised with the DSO who will ensure procedures are followed.

4.22   **Safeguarding concerns about an external organisation (on Academy premises).** If there is a concern about an employee from an external organisation, this should be referred to a DSO or DSL in line with the procedures in this policy.

4.23   **External hirers.** It is important that organisations/individuals who hire the academy premises comply with the academy's safeguarding policy and procedures. Concerns regarding these individuals will be referred to the DSO who will follow procedures. To reinforce the importance of safeguarding, the Academy has identified minimum requirements that must be met by any hirer prior to a booking being accepted from them. These are included in terms and conditions booking form.

4.24   **Support for staff raising concern.** The Academy will fully support and protect any member of staff who, in good faith, reports his or her concern that a colleague is, or may be abusing a child. If an allegation is made that is found to be malicious or fraudulent the Academy retains the right to take action against the individual responsible for making the claim.

4.25   **Referral for consideration of barring**. If an allegation/concern is substantiated and the person is dismissed, resigns or the Academy decides to cease to use their services, then the DSL in conjunction with the local authority designated officer/s will decide whether a referral should be made to the disclosure and barring service (DBS) as regards whether that individual is barred from, or has

conditions imposed in respect of working with children. If a referral is required, it should be made as soon as possible. A referral must always be made if the Academy thinks that the individual has harmed or poses a risk of harm to children.

ONLINE SAFETY

4.26 The welfare of the children in the Academy environment is paramount and governs our approach to the use and management of electronic communications and technologies.

4.27 Children, who are involved in any Academy activities both onsite or offsite, must not be exposed to the following areas of risk by staff members in any capacity, by other children, family members or other persons both online (including group chats, forums, through online tuition or emails) and/or in person:

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If this is identified it can also be reported to the Anti-Phishing Working Group.

4.28 Online bullying and harassment of any kind by any person is not tolerated. Concerns may be reported using the Report and Support portal, a staff member, DSO or the DSL. Where it is found to involve a staff member, student or another person connected to the Academy disciplinary action may be taken.

4.29 Staff must familiarise themselves with and adhere to the Academy's Social Media Guidance.

4.30 **Filtering and monitoring:** Under-18 students are not granted access to internal Academy IT systems. However, any concerns or misuse of the Academy's IT systems will be dealt with as outlined in the IT Policy. Online or safeguarding risks identified or reported will be reviewed and investigated in line with the procedures in this and other Academy policies and must be brought to the attention of the DSL.

RECRUITMENT AND VETTING

4.31 The Academy takes seriously its safeguarding responsibility to ensure that every effort is made to apply best practice for safer recruitment and vetting. See HR guidance or contact for advice.

TRAINING

4.32 The Academy will make every effort to train and update staff, DSOs, the DSL and the governing body receive safeguarding training suitable for their role and responsibilities.

CODE OF PRACTICE (COP)

4.33 The Academy wants to ensure that all staff who come into contact with children understand the boundaries of appropriate behaviour. Every member of staff is required to demonstrate exemplary behaviour in order to protect children from abuse. The following are examples of behaviour that create a positive and safe environment for staff groups at the Academy.

4.34 **Staff must:**

- Adopt an '**it could happen here**' approach to safeguarding.
- Always put the welfare of a child first.
- Report all concerns, allegations or suspicions of abuse, harassment, bullying, victimization and/or discrimination to the relevant DSO for the Academy.
- Take responsibility for ensuring that they know and can contact those with designated roles.
- Treat everyone with fairness and respect.
- Demonstrate a commitment to ensuring child safety in all areas of Academy life, taking action to safeguard children where risk is foreseeable.
- Work openly, avoiding private or unobserved situations.
- Challenge all unacceptable behavior in accordance with this code of practice.
- Ensure that every interaction with a student and staff member is based on mutual trust. Everyone, irrespective of age, disability, gender or identity, race, religion, belief or lack of, sex, sexual orientation is entitled to be treated with respect and dignity.
- Ensure that *informed* consent is gained for all photographs or photographic images of Academy students and their families. Informed consent is where full knowledge about what the person is agreeing to is given prior to any image being taken and that they also have the opportunity to decline. They must be given details about the purpose of the image, where and how it will be used and discuss whether there are any limitations to use. Where this involves a child, consent must be recorded in writing by the child's parent/legal guardian.

4.35 **Staff must never:**

- Have favourites and spend time alone with children outside the scope of tuition.
- Take children on car journeys without prior consent from their parent or guardian, a DSO or the DSL is notified and they hold the necessary business use cover on their insurance.
- Give out personal contact details or communicate directly with a child (personal phone or mobile number, email, or home address).
- Befriend a child or children or their families in person or on any messaging services, websites or social networking sites or apps including WhatsApp, Facebook, Instagram, Twitter.
- Take photographs of children on their mobile phones, contrary to Academy policy and/or share them with others
- Engage with a child on a one-to-one basis in a secluded area or behind a closed door including toilets or practice spaces (outside the behaviour or conduct expected in one-to-one or group music tuition),
- Establish online networking, group or blog forums which are not regulated with controls relating to the Academy governance and scrutiny.
- Leave a child or group of children without supervision.
- Use inappropriate or sexual language, make sexually suggestive comments, and/or engage in sexually provocative behaviour or allow colleagues to use inappropriate language or behaviour without challenging it.
- Engage in or pursue sexual contact with anyone under 18, including grooming behaviour and/or abuse or exploitation of a position of power or trust.
- Assist a child with activities of a personal nature.
- Allow disclosures of safeguarding and welfare concerns about a child or children to be ignored, not recorded or not acted upon.

- Bully, harass, humiliate, or victimize a child including through threat, intimidation, abuse or control.

4.36 **Physical contact:**

- All staff must abide by industry best practice and within the law in relation to physical contact.
- The Academy advises that music technique should be taught through demonstration, instruction and explanation first before the use of physical contact.
- Physical contact within the lesson should be carried out with explicit consent. This means that the exact contact and reason for it should be explained before and the child given the opportunity to express their opinion.
- Staff should be alert to any non-verbal communication that may indicate discomfort or distress.
- Staff should never engage in any inappropriate physical contact with children. This includes touching the child anywhere for the purpose of sexual gratification or conducted in a manner that is casual or secretive. Contact should never be intimidating or put the child at risk of harm.
- It is recognised by the Academy that there are circumstances when it may be appropriate to use physical contact and/or 'reasonable force' to safeguard children. 'Reasonable' means 'using no more force than is needed' and is down to professional judgement within the context of the law and circumstances. For example, it may involve passively blocking the path of a student or breaking up a fight. It is recognised that the adoption of a 'no contact' policy may leave staff unable to fully support, safeguard and protect students.
- Other scenarios may include assisting a student who requires reasonable adjustments or support, administering first aid or preventing a health and safety risk or incident.

APPENDIX 1 - DEFINITIONS OF CHILD ABUSE

As set out in Keeping Children Safe in Education 2023

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and the Academy's policy and procedures for dealing with it.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to medical care or treatment.
- It may include neglect of, or unresponsiveness to, a child's basic emotional needs.

Safeguarding Issues

Child-on-child abuse: It is recognised that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside the Academy and online. All staff should be clear as what to do with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. All staff should understand that even if there are no reports in the Academy it does not mean it is not happening, it may be the case

that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to a DSO or the DSL. It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

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

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

Domestic Abuse: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female Genital Mutilation (FGM): Whilst all staff should speak to the DSL or a DSO with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental Health: All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy, and speaking to the DSO or DSL.

Serious violence: All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Appendix 2: Flow-chart Child Protection Procedures

Recognise

- **Recognise the signs of abuse** and/or neglect, a welfare concern, a safeguarding issue and/or a need for early help
- Recognise when a concern may arise:
    - Direct disclosure
    - Indirect disclosure
    - Behaviour of child / children
    - Behaviour of adult(s)
- Recognise when the behaviour or conduct of an adult indicate a safeguarding risk

Identify support needed

What support does the child need?
- Medical assistance or referral
- Mental Health support
- Local Authority and Early Help
- Police and urgent child protection
- Information and advice
- Internal Academy support – academic, learning, wellbeing

Respond

- A disclosure may be made by a child to anyone, anywhere, at any time
- **All concerns and/or risks** must be dealt with **as a priority**
- Listen to the child with patience and without judgement in an appropriate location with two members of staff
- Ask for clarification using open questions
- Never promise confidentiality
- Explain what will happen next

How to respond

- Listen
- Reassure
- Be curious
- Clarify
- Don't rush
- Don't judge
- Don't assume

Open questions:
- Who...
- What...
- When...
- Where...
- How...

Refer

- **Refer the concern** to a DSO or the DSL as soon as possible
- A referral to the Local Authority must be made where a child has or is likely to suffer from harm (within 24 hours)
- When a crime has or may have been committed or in an emergency the Police must be informed.
- Contact can also be made with the NSPCC to seek advice

How to refer

In an emergency (medical or police) always call **999**.
Contact the designated Academy DSO and/or DSL as soon as possible who will assess and decide:
Whether a report should be made to the Local Authority (LA)
Seek further advice from LA or NSPCC

Record

- **Complete a record** at the earliest opportunity including:
- A comprehensive account from the child
- Questions asked and responses
- Times, dates, locations, those involved, witnesses, digital evidence (CCTV, phone)
- Actions taken, decisions made and outcome
- Who was informed and any information sharing decisions taken

What to record

- Date, time, location of conversation
- Details of those present
- Who does the concern involve
- What is the concern
- When did the issue/event happen
- Where did it take place
- How did it happen
- Actions, decisions and referrals

Concern identified	→	Refer and seek advice from DSO / DSL (within 24 hours)	→	Decision	No further action Internal action External referral

Low-level concerns, welfare concerns or anonymous reports can also be submitted online via **Report + Support**

Appendix 3: Flow-chart
Concerns/allegations against staff

Recognise

- Maintain 'it could happen here' approach
- A child may make an allegation directly
- Another child or adult may identify behaviour or conduct by a staff member that raises concern of a welfare concern or safeguarding risk
- The Academy is made aware of child safeguarding concerns relating to something that happened somewhere else
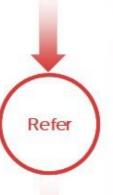- Low-level concerns raised by anyone

Identify support needed

What support does the child need?
- Medical assistance or referral
- Mental Health support
- Local Authority and Early Help
- Police and urgent child protection
- Information and advice
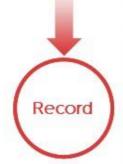- Internal Academy support – academic, learning, wellbeing

Respond

- The **welfare of the child is paramount**
- Keep the safety and welfare of children as the central concern
- Identify whether there is **an immediate safeguarding concern** to children
- Follow the guidance in Appendix 2 and if appropriate obtain an initial account from the party disclosing the concern
- Think about how to best support the child
- Do not judge or confront the staff member

Concerns or allegations that may meet the harm threshold

- Behaved in a way that **has harmed** a child or **may have harmed** a child, and/or
- Possibly committed a criminal offence against, or related to, a child, and/or
- Behaved towards a child in a way that indicates they are unsuitable to work with children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

Refer

- **Refer the concern to a DSO or the DSL immediately** who will determine whether it meets the **harm threshold**.
It is for the DSO/DSL to:
- Ensure the child is not at risk
- Determine if an investigation is required
- Appoint a case manager
- Liaise with the Local Authority/Police
- Liaise with HR and determine interim actions including suspension is appropriate

Concerns or allegations that do not meet the harm threshold

- Does not meet the harm threshold and not within scope outlined above
- Behaviour inconsistent with staff code of conduct inside or outside the Academy
- Poor practice
- Inappropriate behaviour including befriending or sharing contact details
- Low-level concerns
- Breach of code of practice or other staff policies

Record

- **Complete a record** at the earliest opportunity including:
- A comprehensive account from the child
- Questions asked and responses
- Times, dates, locations, those involved, witnesses, digital evidence (CCTV, phone)
- Actions taken, decisions made and outcome (or not taken and reason)
- Who was informed and any information sharing decisions taken

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| Concern identified | → | Refer and seek advice from DSO / DSL (immediately) | → | Decision | No further action Internal action External referral |

Low-level concerns, welfare concerns or anonymous reports can also be submitted online via **Report + Support**

APPENDIX 4 - SAFEGUARDING CONTACTS

Designated Safeguarding Lead (DSL)

Dean of Students   Elizabeth Kenny   e.kenny@ram.ac.uk

Designated Safeguarding Officers (DSOs)

Director of Junior Academy (DSL JA)	John Hutchins	j.hutchins@ram.ac.uk
Junior Academy Teacher	Helen Kuby	helen.kuby18@ram.ac.uk
Director of First Strings Experience	Paola Delucchi	pdelucchi@ram.ac.uk
Director of Primary Academy	Krystyna Budzynska	k.budzynska@ram.ac.uk
Head of Open Academy	Julian West	julian.west@ram.ac.uk
Senior Tutor in Undergraduate Pastoral Support	Ruth Byrchmore	r.byrchmore@ram.ac.uk
Senior Case Manager	Fran Latham	flatham@ram.ac.uk

External Contacts

NAME	ROLE	CONTACT DETAILS
Police	To report child abuse	999 in an emergency or 101 for non-emergency. Further information at **Met Police website**
Local Authority Children's Social Care contacts	Emergency children's social care	Westminster emergency duty team: **Telephone:** 020 7641 4000 **Out of hours:** 020 7641 6000 **Email:** accesstochildrensservices@westminster.gov.uk Click here for all **London Safeguarding Contacts** or online tool **Report Child Abuse to a Local Council**
NSPCC HELPLINE SERVICE	For advice or to report a concern	0808 800 5000 (10am to 4pm Monday to Friday) help@nspcc.org.uk or Report online **NSPCC**
CHILDLINE	Free 24-hour helpline for children in distress or danger	0800 1111 Get support online via **Childline**