Safeguarding Policy

2024-25

www.kaa.org.uk

Contents

INTRODUCTION & ETHOS

Kensington Aldridge Academy recognises our moral and statutory responsibility to safeguard and promote the welfare of all of our students. Our staff and Trustees are committed to providing an ethos and environment with robust systems to ensure the safety and healthy development of all of our students, with their best interests at the centre of our work.

Everyone working in or for KAA takes all welfare concerns seriously; we follow our procedures, informed by current guidance and legislation to ensure that all students, regardless of age, gender, ability, culture, race, religion or sexual identify have equal rights to protection and support.

This safeguarding policy is consistent with the Child Protection Procedures outlined in the following publications:

- 'Keeping Children Safe in Education', DfE, *September 2024* (updated)
- 'Working Together to Safeguard Children', *2023*

This policy complies with additional statutory and legislative requirements and guidance that seek to protect children which can be found listed in Appendix 1.

Many additional academy policies incorporate and consider our duty to safeguard our students, all of which can be found on the academy website. Primarily, the listed policies do so:

- Behaviour Policy
- Suspensions Policy
- Staff Code of Conduct
- Attendance Policy
- Safer Recruitment Policy
- Separated Parents Policy
- Promoting British Values Policy

NAME	ROLE
Amy Gurnell	Vice Principal & Designated Safeguarding Lead (DSL)
Ryan Bernard	Senior Vice Principal & Deputy Designated Safeguarding Lead (DDSL)
Afra Georgiou-Matson	Senior Safeguarding Officer & Deputy Designated Safeguarding Lead (DDSL)
Adam Whitlock	Assistant Principal (Sixth Form) & Prevent Officer
Paul Fletcher	Chair of Trustees
Scott Harrison	Nominated Trustee

Staff with key safeguarding responsibilities

NAME	ROLE
Dounya Jezierski	Safeguarding Outreach Lead
Taymia Choaibi	Safeguarding Officer
Nikki Sullivan	Director of Inclusion/Mental Health Lead (maternity leave)
Jenny Donaldson	Director of Inclusion/Mental Health Lead (maternity cover)
Nell Webb	Co-SENCo
Adam Grace	Co-SENCo / Designated Teacher for Children Looked After
Beatrice Gogarty	Co-Director of Learning (Year 7)
Daisy Rudkin	Co-Director of Learning (Year 7)
Isabella Madill	Co-Director of Learning (Year 8)
Issie Dewes	Co-Director of Learning (Year 8)
Radhika Chauhan	Co-Director of Learning (Year 9)
Harry Gibbins	Co-Director of Learning (Year 9)
Grace Cockell	Co-Director of Learning (Year 10)
Natalia Kruk	Co-Director of Learning (Year 10)
Hisham Abubaker	Co-Director of Learning (Year 11)
Emily Nix	Co-Director of Learning (Year 11)
Rhys Jones	Director of Learning (Year 13)

2. ROLES & RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers, and trustees at the Academy. This section expands upon the roles and responsibilities of key personnel and collectives.

The **KAA Board of Trustees** retain statutory responsibility for ensuring that all legal responsibilities are discharged. The Board of Trustees will:

- Approve the Academy Safeguarding Policy at the beginning of every academic year
- Hold the Designated Safeguarding Lead (DSL) to account for the implementation of the policy
- Require the DSL to report on the measures the Academy is taking to ensure compliance termly
- Appoint a trustee to monitor the effectiveness of this policy in conjunction with the full Board of Trustees (the named trustee at KAA is Scott Harrison)
- Read Keeping Children Safe in Education 2024
- Delegate the Chair of Trustees to act as 'case manager' in the event that an allegation of abuse is made against the Principal

The **Principal** is responsible for the implementation of this policy and will:

- Ensure that a senior member of the academy's leadership team is designated to take lead responsibility for child protection
- Ensure that a Prevent liaison officer is designated to lead on preventing radicalisation
- Communicate this policy to parents and via the Academy website
- Ensure that the DSL has the appropriate time and resources to manage safeguarding and child protection across the academy effectively
- Read Keeping Children Safe in Education 2024
- Act as 'case manager' in the event of an allegation of abuse is made against a member of staff or volunteer

Responsibility is delegated to the **Designated Safeguarding Lead (DSL)** to act on behalf of the KAA Board of Trustees and Principal for safeguarding and child protection across the academy.** The DSL will:

- Update the Safeguarding Policy annually, or in conjunction with changes to legislation
- Ensure that policies are compliant with the appropriate legislation and statutory guidance, including local authority guidance and locally agreed inter-agency procedures
- Ensure that policies and procedures are fully implemented, understood, and followed by all staff
- Ensure that all staff have access to and understand the Academy's Safeguarding Policy
- Provide safeguarding and child protection appropriate training to all staff, including mid-year starters and volunteers/visitors where appropriate*
- Ensure that key personnel within the safeguarding team are certificated to the appropriate level with regards to safeguarding training**
- Ensure that procedures for dealing with allegations of abuse against staff and volunteers comply with local authority guidance and locally agreed inter-agency procedures
- Maintain awareness of Prevent intervention in conjunction with the relevant guidance and work effectively with the designated Prevent liaison officer

- Inform the Principal of any issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Provide advice and support to other staff with safeguarding responsibility on safeguarding matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Delegate responsibility of referrals to the relevant bodies, investigating safeguarding concerns and attend meetings with professionals where appropriate
- Ensure Academy representation at Child Protection Conferences
- Quality assure safeguarding procedures carried out by the wider safeguarding team
- Monitor CPOMS to ensure accurate record keeping and maintain expectations that all safeguarding or welfare concerns are investigated in a timely manner
- Ensure that all staff 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 a timely manner in accordance with agreed whistle blowing policies
- Ensure that KAA operates safer recruitment procedures and make sure that all appropriate checks are carried out on staff and volunteers who work with children**
- Oversee and periodically audit the Single Central Record**
- Ensure that where services or activities are provided on the Academy premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the Academy on these matters where appropriate
- Organise appropriate time to discuss and explore open safeguarding incidents with the relevant members of the wider safeguarding team (half-termly safeguarding hub meetings)
- Maintain an up-to-date Central Safeguarding Register which lists all open safeguarding cases (EH/CiN/CP) and the appropriate contact details within external services
- Develop and share a weekly 'vulnerable student' register with all staff via the bulletin to ensure appropriate and proactive monitoring

*As appropriate, the DSL will delegate responsibilities as listed above to the relevant members of the wider pastoral team, primarily the Academy's **Deputy Designated Safeguarding Leads**, **Senior Safeguarding Officer**, **Safeguarding Officers**, **Directors of Learning**, **Director of Inclusion** and named members of staff supporting students with SEN.

The Academy's **HR manager is responsible for providing the appropriate support for all matters in relation to safer recruitment, training updates, staff induction and the monitoring of the Single Central Record.

The Academy's Director of Inclusion holds additional responsibility as **Mental Health Lead**. The Mental Health Lead should:

- Monitor all relevant incidents relating to mental health concerns, including self-harm and suicidal ideation via CPOMS and will intervene where necessary
- Ensure that the appropriate members of staff receive the appropriate training to ensure that all students' mental health is supported and remains a priority of the academy
- Liaise and support the DSL effectively with any concerns or matters of this nature

The Academy's **Designated Prevent Officer** is responsible for ensuring that all staff at the academy, in our exercise of functions, have a 'due regard to the need to prevent people from being drawn into

terrorism', as per Section 26 of the Counter-terrorism and Security Act 2015. Listed responsibilities and actions required in such instance are listed in the 'Procedures' section of this policy.

Finally, as stated in Keeping Children Safe in Education, 2024, 'safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play.' **All staff** at KAA must:

- Report any safeguarding concerns immediately, via CPOMS, but if not possible for exceptional circumstances, staff will report safeguarding concerns before the child goes home, allowing enough time for the safeguarding team to make a decision regarding follow-up
- Read Part 1 of Keeping Children Safe in Education 2024 and fulfil all duties as outlined in this statutory legislation
- Complete internally delivered safeguarding training, be familiar with this policy, complete the safeguarding quiz shared by the DSL and sign the safeguarding declaration
- Listen to any disclosures by a student carefully and sensitively, whilst ensuring that under no circumstances, promises of confidentiality are made
- Remain vigilant and proactive in looking out for safeguarding concerns, ensuring that there is never an element of complacency in this field and remembering that 'it could always happen here'
- Monitor vulnerable students within tutor groups and in lessons, reporting emerging concerns swiftly via CPOMS
- Understand how additional academy policies as listed in the 'Introduction' section of this policy contribute to safeguarding our students
- Behave in accordance with the Academy's published Code of Conduct and the professional standards as outlined in the Staff Handbook
- As emphasised in KCSIE 2024, consider advice offered about how to build trusted relationships with children and young people which facilitate communication
- As highlighted in KCSIE 2024, demonstrate professional curiosity and proactively speak with the DSL or member of the safeguarding team if concerns are had about a child

3. CHILD PROTECTION

Staff have a duty to take action on suspicions of abuse, or reported allegations of abuse, following the procedures set out in Section 4 of this policy.

Staff must be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. It can take many forms and guidance is set out below on the possible warning signs and appropriate procedures.

This section comprises the following information:
- Objectives
- Abuse
- Specific Safeguarding Concerns
- Identifying children who are suffering or likely to suffer abuse
- Procedures to ensure that students are safe at KAA and at home:
    - Immediate reporting requirements
    - Responding to a disclosure
    - Action by Designated Safeguarding Lead
    - Action following a Child Protection referral
    - Recording and monitoring
    - Supporting the child and partnership with parents

Objectives

1. To support the child's or young person's development in ways that will foster security, confidence and independence
2. To raise the awareness of all staff of the need to safeguard students and of their responsibilities in identifying and reporting possible cases of abuse
3. To raise awareness of all staff on how to manage the requirement to maintain an appropriate level of confidentiality; staff should never promise a child that they will not tell anyone about an allegation
4. To provide a systematic means to monitor students known or thought to be at risk of harm
5. To emphasise the need for excellent levels of communication between all members of staff
6. To develop a structured procedure that will be followed by all staff in cases of suspected abuse
7. To develop and promote effective working relationships with other agencies, especially Early Help, social services, Prevent, Channel programme and the police

Throughout this policy, the word 'child' will be used. The Children Acts 1989 and 2004 define a **child** as anyone who has not yet reached his/her eighteenth birthday.

Despite this, as set out in Education and Training (Welfare of Children) Act 2021, KCSIE applies to providers of post-16 education. The guidance states our policies must be 'exercised with a view to safeguarding and promoting the welfare of children receiving education or training at the Academy', meaning that *all* students, including that those that *have* reached their eighteenth birthday are supported via consistent internal safeguarding procedures. We acknowledge that this does not defer from legal differences between supporting a child and an adult.

Abuse, neglect and exploitation

KAA uses the definition of 'abuse' as described in KCSIE 2024 as '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. Children may be abused either 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. Abuse takes many forms, including physical, sexual or emotional abuse and neglect.

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. This may include conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

Sexual abuse
Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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. Also, non-contact activities such as involving children in looking at, or in the production of, sexual images or watching sexual activities.

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. This may involve a parent or carer failing to provide adequate food, failing to protect a child from physical or emotional harm, and failure to ensure access to appropriate medical care or treatment.

Teachers and other adults in KAA are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, students, parents and the public which foster respect, confidence, and trust can lead to disclosures of abuse, and/or KAA staff being alerted to concerns.

Staff must be aware that there is greater risk for students on the SEN register and Children Looked After, as well as children who were previously looked after.

Signs of possible abuse
The following list is not prescriptive and many signs listed will not necessarily indicate abuse. They can only act as a guide:
- Unexplained injuries, bruising etc.
- Absences from KAA that do not have a reasonable explanation or exhibit a suspicious pattern
- Significant change of behaviour
- Watchful cautious response to adults

- Inability to be spontaneous
- Aggressive or abusive
- Bullying other children or being bullied
- Underachieving, unable to concentrate
- Avoiding the removal of clothing in PE, etc.
- Truanting, lying or stealing
- Inability to trust others and make friends

Potential indicators of sexual abuse:
- Loss of self-esteem
- Significant lack of self-care i.e., dirty clothing
- Inappropriate use of sexual talk or sexualised behaviour
- Wetting/soiling
- Fearful of physical contact
- Eating disorders, substance/drug use, cutting, etc.

Specific Safeguarding Concerns

There are additional specific safeguarding issues, which staff will be made aware of via training and must be familiar with. Procedures have been put in place in this policy and in other policies (for example, attendance policy, Promoting British Values) to support tackling these issues.

Bullying inc. Cyberbullying	Children Missing Education (CME)*	Children Missing from Home or Care
Child Criminal Exploitation (CCE)*	Child Sexual Exploitation (CSE)*	Domestic Violence
Drug Abuse	Alcohol Abuse	Fabricated or Induced Illness
Female Genital Mutilation (FGM)*	Honour-based Violence (HBV)*	Gang and Youth Violence
Homelessness	Hate	Mental Health
Private Fostering	Radicalisation	Online Safety*
Sexting	Trafficking	Upskirting

Further information regarding some of the above specific issues is listed below.

Female Genital Mutilation (FGM)
FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for nonmedical reasons.

FGM is illegal in the UK. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face **disciplinary** sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all practitioners to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

Teachers must **personally** report to the police cases where they discover that an act of FGM appears to have been carried out.

The age at which girls undergo FGM varies enormously according to the community, from new born to first pregnancy. Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the

start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

Some of the indicators FGM may be about to take place:
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk
- Parents state that they or a relative will take the child out of the country for a prolonged period

There are a number of indications that a girl or woman has already been subjected to FGM:
- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual, or stomach problems
- There may be prolonged or repeated absences from school or college

Child Sexual Exploitation (CSE)
CSE is as a form of child sexual abuse. Guidance states that 'it 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 (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.'

Children rarely self-report child sexual exploitation so it is important that staff are aware of potential indicators of risk, including:
- Acquisition of money, clothes, mobile phones etc., without plausible explanation
- Gang association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

Child Criminal Exploitation (CCE)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity; drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market towns, and seaside towns. Other specific forms of CCE are being forced or manipulated into committing crimes including shoplifting, vehicle crime, or serious violence to others.

Staff at KAA must be aware that 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.

Legislation emphasises that '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'.

Additional points regarding CCE:
- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation

Whilst age may be the most obvious power imbalance, this can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Upskirting
Upskirting is a criminal offence. This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

Honour-based violence (HBV)
Honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such.

There are a range of potential indicators that a child may be at risk of HBV and are similar to the signs for FGM.

Children missing from education (CME)
All staff must be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities.

This may include the following:
- Abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation
- Mental health problems
- Risk of substance abuse
- Risk of travelling to conflict zones
- Risk of female genital mutilation or risk of forced marriage

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Designated staff at KAA must take responsibility for investigating concerns surrounding attendance; the procedures are outlined in the Attendance Policy.

Homelessness
Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help, which includes:
- An assessment of their needs and circumstances
- The development of a personalised housing plan
- Work to help them retain their accommodation or find a new place to live
- Early intervention and encouraging those at risk to seek support as soon as possible, before they are facing a homelessness crisis

In most cases, we will be consider homelessness in the context of children who live with their families, and intervention will be on that basis, however it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will lead on this but the DSL will implement strategies and inform services of concerns as soon as possible.

Prevent
From 1 July 2015 specified authorities, including all schools are subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

Indicators of extreme behaviour includes some of the following:
- Verbal comments - praising *Daesh* or out of context reference to *jihad*; praising extreme figure heads like Hitler; discussing other religions in a disparaging way
- Peer actions - refusing to work with others owing to their religion/beliefs
- Personal beliefs - extreme views on foreign policy; claims they should fight for their people abroad
- Communications - the use of social media to publicise extreme views; drawing inflammatory images like swastikas

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's

vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

At KAA, it is the duty of all staff to protect vulnerable students from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

As with other safeguarding risks, staff must be alert to changes in student behaviour which could indicate that they may need help or protection. KAA staff must use their judgement in identifying students who might be at risk of radicalisation and act proportionately which may include the Prevent liaison officer making a referral to the Channel programme.

Further indicators are available in the Promoting British Values Policy on the academy website.

<u>Online Safety</u>
Information relating to keeping students safe online can be found in section 7 of this policy and the Academy's behaviour policy.

4. PROCEDURES

All staff must follow the Child Protection Procedures which are consistent with *'Working Together to Safeguard Children'* (2023) *'What to do if you are worried a child is being abused'* (2015) and *'Keeping children safe in education'* (2024).

It is *not* the responsibility of KAA staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff have a duty, however, to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of students must be recorded on CPOMS and triaged amongst the safeguarding team.

Issues that require immediate reporting by staff
- any suspicion that a student is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a student may have suffered harm (e.g., worrying drawings or play)
- any concerns that a student may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a student is presenting signs or symptoms of abuse or neglect
- any significant changes in a student's presentation, including non-attendance
- any hint or disclosure of abuse from any person
- any concerns regarding person(s) who may pose a risk to children (e.g., living in a household with children present)
- any concerns of a student showing physical discomfort, including walking and sitting down
- any concerns regarding a student suffering urinary, menstrual, or stomach problems after lengthy absence
- any concerns regarding a student expressing support for terrorism or any form of extremism in language or actions
- any concerns a girl has had Female Genital Mutilation (FGM) - this will be a mandatory reporting duty by all staff to the police

Responding to disclosure
Disclosures or information may be received from students, parents or others. KAA recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff must handle disclosures with sensitivity. Such information cannot remain confidential and staff must **immediately** communicate what they have been told via CPOMS.

Action by the Safeguarding Team
Following any information raising concern, the safeguarding team will consider the below questions:
- Does the child require immediate medical attention?
- Do I need to discuss the matter with other agencies involved with the family already? (e.g., Early Help practitioner, Social Worker, CAMHS therapist etc.)
- Do I need to consult any appropriate internal persons? (E.g., Designated Safeguarding Lead or Deputies, Designated Prevent Officer, Director of Inclusion, Place2Be therapist etc.)
- Does Place2Be need to complete a risk assessment for the young person?

- Where possible, I need to speak to the parents; is this appropriate or may this place a student at risk of significant harm, impede any police investigation and/or place a member of staff or others at risk?
- Do I need to seek advice from the front door team at the relevant local authority?
- Do I need to make a referral to children's social care because a child is suffering or is likely to suffer significant harm? If so, does this need to be undertaken immediately?
- Do I need to report this to the police?
- Is the child safe to go home at the end of the school day or does an alternative plan need to be put in place?

To support the safeguarding team with triaging through a safeguarding concern, the supporting document presented in Appendix 2 is displayed in the relevant offices for ease of access.

In addition, and in accordance with the procedures or advice of the LA safeguarding children's board, the following should be considered by the safeguarding team:
- Additional discussion with the student
- Discussions with bystanders
- 1:1 discussion with the member of staff reporting the concern to gain further clarity
- Not to make a referral at this stage
- If further monitoring is necessary
- If it would be appropriate to undertake an assessment and/or make a referral for other services; these services can include Early Help, which can provide voluntary support to families

All information and actions taken, including the reasons for any decisions made, must be fully documented on CPOMS. Any referrals to children's social care or any other external services must be added to the 'document vault' on CPOMS and logged under the 'referrals' tab on the Central Safeguarding Register.

Action by the Designated Prevent Liaison Officer
If the disclosure is in relation to extremist views or actions, the designated Prevent liaison officer must initiate a process as follows:
- gather all relevant detail from the referrer and discuss with the designated safeguarding officer to understand any broader safeguarding concerns and links
- seek advice from the Prevent education officer at the local bi-borough
- action may take the form of the following:
  - speak to the student about the concerns and evaluate whether further cause for concern is necessary
  - put a support package in place to address concerns in-house using approved resources and monitor
- when further concern is flagged, or at the advice of the Prevent education officer at the local bi-borough, a referral might be made to the Channel Panel
- in accordance with the Channel process, the following actions may be taken:
  - Channel Panel sometimes do a background check on the student to see if any pre-existing concerns are present
  - information about concerns are given to the Channel Panel by the designated Prevent liaison officer at KAA to discuss at the first meeting. This takes a multi-agency approach to offer ways to support the student, family, and KAA in working through extremist ideologies.

- agreed support is put in place and monitored by the designated Prevent liaison officer and safeguarding officer

N.B (1): *In the early stages it is important to note that parents/guardians are informed when Prevent related discussions are had with students and no Channel process can take place without the consent of the parents/carers.*
N.B (2): *The designated Prevent liaison officer at KAA will be present in all Channel meetings to ensure the best interests of the student are always at the heart of the discussion.*
N.B (3): *The whole process is recorded in writing and will go on the student's file via CPOMS purely as a record for safeguarding; this will be confidential to the school and only shared with the local Prevent team should the need arise. This record will not be used in any future referencing or disadvantage the student in any way.*

Action following a child protection referral
A nominated member of the safeguarding team should:
- make regular contact with the social worker involved/Channel officer to stay informed
- wherever possible, attend strategy discussion meetings
- provide a report for, attend, and contribute to any subsequent Child Protection Conference or Channel Panel
- if the child or children are placed on the Child Protection Register, contribute to the Child Protection Plan and attend Core Group Meetings and Review Child Protection Conferences
- where a child on the child protection register moves from KAA or goes missing, immediately inform the key worker in the social care department

Recording and monitoring
At KAA, we acknowledge the importance of accurate reporting and commit to doing so via CPOMS. Accurate records must be made as soon as practicable and will clearly distinguish between observation, fact, opinion and hypothesis. All records are automatically dated on CPOMS. All Child Protection documents will be retained in the document vault on CPOMS, only available to members of the safeguarding team with authorised access granted by the DSL.

Supporting the child and partnership with parents
- KAA recognises that the child's welfare is paramount and that good child protection practice and outcomes rely on a positive, open, and honest working partnership with parents
- While, on occasion, we may need to make referrals without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child, acting with the advice of the LA children's safeguarding board as appropriate
- We will provide a secure, caring, supportive, and protective relationship for the child
- Children will be given a proper explanation (appropriate to age & understanding) of what action is being taken on their behalf and why
- We will endeavour always to preserve the privacy, dignity, and right to confidentiality of the child and parents; the DSL will determine which members of staff need to know personal information and what they need to know to support and protect the child

Two additional documents to support staff with disclosures and understanding the referrals process can be seen in Appendix 3 and 4.

5. MENTAL HEALTH & SELF-HARM

At KAA, we are committed to supporting all students who are experiencing challenges with their mental health and academy staff are consistently collaborating with external specialists to further the support offered via our partnerships with CAMHS, Place2Be, LCAT and MIND.

As with all concerns surrounding a student, KAA staff must report any concerns for a child's wellbeing on CPOMS, where concerns are dealt with by key safeguarding personnel and/or **Jenny Donaldson, the Academy's Mental Health Lead.**

Each child is treated as an individual and every concern is unique, so the academy does not operate a 'one size fits all' model to support students with their mental health, expressions of suicidal ideation, and self-harm, however to ensure transparency and consistency, the following flow-chart is used as guidance.* This example is focused on an incident of self-harm; however, the same process is used to respond to an incident whereby a young person has expressed suicidal ideation.

*To note, where individual students are known to the safeguarding team, have self-harmed previously, a risk assessment has already been carried out and the imposed safety plan remains fit for purpose, members of the safeguarding team, in conjunction with parents/professionals involved, have the right to exercise an alternative plan.

TEACHER ACTION - A student has self-harmed.

This may come in the form of a direct student disclosure, a member of staff has reported on CPOMS, a student has reported on behalf of another, or a parent may have reported to you about their own child. Email oncall if medical attention is evidently required.

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SUBSEQUENT STEPS FOR SAFEGUARDING TEAM - Step 1 - Ascertain safety.

Are there open wounds that require medical attention? If so, escort the student to the Student Support Officer immediately, unless wounds require attention from the emergency services. Establish where the harm is located, when it happened and what apparatus was used. Student Support Officer to establish further detail of nature of wounds where possible to inform next steps.

Step 2 (a) There are open wounds and the student has self-harmed inside the academy. Ensure student remains supervised at all times. Check context to ensure safe to call home. If no, contact duty team for next steps. If yes, contact home, explain what has happened and request that a parent/carer collects their child as it is imperative that we are able to assess risk to ensure safety. Arrange meeting for later that day or following morning.

Step 2 (b) There are open wounds and the student has self-harmed outside of the academy. Ensure there is passive supervision at all times. Check context to ensure safe to call home. If no, contact duty team for next steps. If yes, proceed to next steps. Explore with the safeguarding team whether it feels safe to have the student remain on school site. If yes, contact home to attend meeting later that day. If no, contact home, explain what has happened and request that a parent/carer collects their child as it is imperative that we are able to assess risk to ensure safety. Arrange meeting for later that day.

Step 2 (c) There are no open wounds and the self-harm is historic. Check context to ensure safe to call home. If no, contact duty team for next steps. If yes, contact home, explain what has happened and arrange a meeting for the following morning. Should a parent explain that they are unable to attend, explore level of urgency with safeguarding team and communicate this accordingly to parent/carers.

Step 3 - If the above meeting is not due to take place until the following day, **safety planning advice must be shared with parent/carers over the phone.** *Remove all sharp objects, do not leave child home alone, refer to Kooth, share NHS Mental Health Crisis number, take child to A&E should you be concerned.*

Before Step 2 or after Step 3 - Ahead of meeting or discussing over the phone with parents/carers, it may be felt appropriate to establish further details around the self-harm. This may be via dialogue with the student themself, the individual who reported the self-harm, or parents. How frequently has this happened? Who is aware? Why does this happen? Can a trigger be identified?

Step 4 – During the meeting, allow time to explain what has happened and establish any further details. Explain the need to **risk assess** and **safety plan** as a priority and plan for a time to do this. If the student is known to Place2Be, their staff can complete this. If the student is known to external services, inc. CAMHS, it may be decided that it is necessary to have the relevant worker present in the safety planning discussion. During this meeting, it may be decided that it is not safe for the young person to return to school until the safety plan has been completed. It may be decided that a referral to external services will be necessary to support the child and the family with managing these challenges. Additional referrals to therapeutic services may be decided upon in this meeting. KAA staff may also suggest amendment to the structure of the school day for the young person temporarily. Next steps and timeline must be clear before the end of this meeting.

Step 5 - Risk Assessment with relevant parties present. Upload to CPOMS.

Step 6 - Safety Plan with relevant parties present.

Step 7 – KAA staff type up the Safety Plan using Provision Mapper and share with relevant parties to sign off, including the DSL. Once the safety plan has been signed off it is to be uploaded onto CPOMS, a printed copy is to be given to the child and final version is to be shared with relevant parties.

Step 8 – Safety Plan Review will take place 6 weeks after the initial safety plan was written. Should any increasing concerns be had during this time, the academy may be obliged to take an alternative approach to keeping the child safe and may require additional support from external services. The safety plan can - and should be - amended accordingly to increase the safety of the child. Should at any stage it be felt that the current safety plan is no longer required, this must be decided collaboratively between school, child and home and must be documented on CPOMS accordingly.

In addition, there are key principles that are followed to ensure the safety of our students, all of which require the support of parents/carers:

- KAA staff are required to share safety planning advice with parents/carers should there be concerns about a young person's mental health
- Should a young person express suicidal ideation with clear and immediate intent whilst on academy site, parents/carers will be asked to collect immediately and escort to A&E (or CAMHS crisis centre should the child already be receiving support)
- Should a young person self-harm whilst on school-site, parents/carers will be asked to collect immediately; next steps will be dependent on the context but may include a visit to the GP or A&E, a commitment to engage in a risk assessment and safety plan, and on rare occasions (as a last resort) a short, authorised absence from school to allow the relevant processes to take place
- Academy staff are required to use professional judgement to ascertain whether a referral to external services is required to further the support offered to a family through these challenges; parents/carers will always be notified if this is the case, unless a Child Protection concern
- Should academy staff detect that the mental health and wellbeing of a young person is not being prioritised by parents/carers or parents/carers are not fulfilling duties as outlined in the safety plan, a consultation or referral to external services may be deemed necessary. Parents/carers will be notified, unless a Child Protection concern.

The Academy operates a risk assessment and safety planning process upon any arising concern of this nature. It is expected that parents/carers and any relevant external professionals involved engage in this process, including when an active document requires review.

The following documents can be found in Appendix 9 of the policy:

- Risk Assessment – Self-Harm
- Risk Assessment – Suicidal Ideation
- Safety Planning Guidance

6. SEXUAL VIOLENCE/CHILD-ON-CHILD ABUSE

At KAA, abuse will never be tolerated or excused as 'banter'. The configuration of CPOMS at the Academy ensure that all reports relating to sexual behaviour or child-on-child abuse are highlighted to the DSL immediately, and are treated as serious.

We are aware of our obligations under the Human Rights Act 1998 and our procedures comply with the relevant requirements as set out in the Equality Act 2010.

Upon the 2022 consultation of KCSIE, it was confirmed that the DfE's standalone 'Sexual violence and sexual harassment between children in schools and colleges' guidance from 2021 would be withdrawn and absorbed fully within the KCSIE legislation. We continue to carefully consider this guidance are proactively seeking to minimise the risk of child-on-child abuse. This can be seen in:

- The further development of the PSHE curriculum, including an increased focus on issues such as respectful behaviours, relationships, consent and sexual harassment. Via this curriculum, students are taught to recognise when they are at risk and how to get help when they need it.
- The introduction of drop-down days for KS4 with a PSHE focus, supporting with address areas of the curriculum that may have been missed due to school closure
- The raised visible profile of issues of this nature via dedicated display boards in key areas of the academy, signposting students to support services
- The delivery of whole staff safeguarding training followed by a quiz and declaration including careful monitoring of completion
- Continued training throughout the academic year on this topic
- The implementation of a duty rota, ensuring that students are monitored and supported during recreational times
- The developing of expertise within the safeguarding team to support any victims of such behaviour*

Please note that this list is not exhaustive, but is an example of how the academy is working to continually tackle this issue.

In addition, staff and visitors at the academy must:

- Report any concerns immediately
- Be clear that child-on-child abuse includes bullying (including cyberbullying), physical abuse (including hitting, kicking, hair pulling or otherwise causing physical harm), sexual violence, sexual harassment and upskirting
- Understand the definitions of sexual harassment, sexual violence, and harmful sexual behaviours
- Understand that not recognising, acknowledging, or understanding the scale of harassment and abuse or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and - in worst case scenarios - a culture that normalises abuse
- Maintain an attitude of 'it could happen here'
- Challenge any form of derogatory or sexualised language or behaviour
- Be vigilant to issues that particularly affect different genders
- Understand that a student harming a peer could be a sign that the child is being abused themselves

In most cases, incidents of students hurting other students will be dealt with in accordance to the Academy's behaviour policy. This policy will apply to any allegations or incidents that raise safeguarding concerns which include where the alleged behaviour:

- is deemed serious and potentially a criminal offence
- could put students in the school at risk
- raises concern due to its explicit violence nature
- involves students being forced into risky or criminal behaviours, such as drugs or alcohol
- involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a student makes an allegation of abuse against another student, staff must alert the DSL immediately and record on CPOMS in detail. It is not the responsibility of staff beyond directed members of the safeguarding team to conduct an investigation. When an incident of this nature is reported, a thorough investigation will be carried out as instructed by the DSL.

Where deemed necessary, the safeguarding team may be instructed to:

- Contact the Family and Children's Services
- Seek advice from the front door team
- Report to the police if the allegation involves a potential criminal offence
- Complete a risk assessment and construct a safety plan for students involved
- Seek support from external services, e.g., CAMHS

In collaboration with students, the DSL and relevant Directors of Learning carefully considered and developed the Academy's approach to dealing with disclosures relating to this topic and support provided for those effected throughout academic year 2021-22. The product of this work can be found in Appendix 7 of this policy.

7. FILTERING & MONITORING

In accordance with the statutory guidance, KAA acknowledges our duty to not only teach students about *how* to keep themselves safe online, but also to implement effective, yet proportionate, filtering and monitoring systems in order to ensure safety online and respond to anything that may indicate a risk to student safety.

This is articulated in full in Appendix 6 of this policy, however in summary:

<u>On site</u>

- KAA's internet services are provided by London Grid for Learning (LGfL), with BT internet as a backup in case of service disruption
- All on site internet traffic passes through the LGfL Firewall which is filtered and monitored by the LGfL Webscreen filtering systems
- All internet traffic then passes through a second firewall provided by Smoothwall; Smoothwall is the industry leader in web filtering and security
- All school owned devices, whilst used on site, are monitored through the Impero Edu Pro project. This system picks up on keywords from a regularly updated list.

<u>On and off site</u>

- Whenever a student is logged onto their KAA account on a device, irrespective of their location, Smoothwall Monitor will risk assess online activity, capture any suspected risk, and alerts KAA's safeguarding team where required
- Students are additionally protected by LGfL 'Home Protect'; this provides safe internet filtering on any device where students are logged with their school account, as with Smoothwall Monitor

In essence, these systems allow academy staff to concentrate on supporting and educating students with the peace of mind that any potential online incidents with be raised with the appropriate members of staff within minutes.

8. SAFER RECRUITMENT

KAA fully observes current DfE guidance *Keeping Children Safe in Education* (2024). We ensure that all appropriate measures are applied in relation to everyone who works in the academy and who is likely to be perceived by the children as a safe and trustworthy adult including volunteers and staff employed by contractors.

Safer recruitment practice includes:

- scrutinising applicants
- undertaking interviews
- verifying identity and academic or vocational qualifications
- obtaining professional references
- checking previous employment history and ensuring that a candidate has the health and physical capacity for the job
- undertaking Disclosure and Barring Service checks for a person to be involved in 'regulated activity'

Single central register

A single central record of safeguarding checks for all staff working within KAA, either on a paid or voluntary basis, must be maintained. This information is entered into the HR information system and reports on this information will be extracted as required.

Please view the Safer Recruitment Policy available on the academy website for further details regarding this, including procedures regarding visitors on site.

9. ALLEGATIONS OF ABUSE MADE AGAINST STAFF

This section outlines how the academy commits to dealing with allegations of abuse made against a member of staff. This may include where a member of staff has allegedly:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

This section applies to staff currently working in the school, however reports of historical behaviour or cases where the staff has left will be referred immediately to the police.

We acknowledge that we have a duty of care to the employee and a named contact for support needs to be provided if a staff member is suspended. Also, we commit to ensuring the case is dealt with very quickly, and in a fair and consistent way.

Actions taken by the DSL and Principal in this instance are listed below:

DSL
- The DSL will discuss the disclosure with the Principal
- If the disclosure/allegation is made against the Principal, the DSL will inform the chair of Trustees directly
- A referral to the LADO is completed prior to any further investigation
- Following advice from the LADO, the following is used to determine the outcome of the allegation investigations:
  - Substantiated: there is sufficient evidence to prove the allegation
  - Malicious: there is sufficient evidence to disprove the allegation
  - False: there is sufficient evidence to disprove the allegation
  - Unsubstantiated: there is insufficient evidence to either prove or disapprove the allegation. The term, therefore, does not imply guilt or innocence
- Advice from the LADO may suggest that additional services may require informing including social services and the police
- The DSL will also follow the guidance in 'Working together to safeguard children' at all times to follow procedures of informing parents at the appropriate time, agreed with external agencies
- The school representative will make every effort to maintain **confidentiality** as directed in the Education Act 2002
- The DSL will have oversight of the investigation

Principal
- The Principal or the Chair of Trustees (in the case of the allegations against the Principal) will inform the member of staff of the agreed actions
- The Principal or Chair of Trustees will ensure the staff member has a named representative to keep the member of staff informed at all times of the investigation
- The Principal will consider whether the member of staff should be suspended but this should not be an automatic response

- The Principal has a legal duty to make referral to the DBS where they think an individual has engaged in conduct that harmed or is likely to harm a child, or if a person otherwise poses a risk of harm to a child
- The Principal must facilitate if a member of staff has been suspended but can now return to work
- The Principal, with the DSL, will have to review actions taken if the allegations were substantiated or if a person has been reinstated from a suspension

Record keeping
- If it has been found to be a malicious allegation, details of allegations should be removed from personnel file of the accused
- All other forms of allegations, actions taken, and decisions reached will be kept in a confidential personnel file of the accused and a copy provided to the person concerned
- The record should be kept until accused person reaches pension age or for a period of 10 years from the date of the allegations

At all times throughout this process the designated DSL/Principal and Chair of Trustees will always consult the appropriate agencies to ensure information is shared and record appropriately and therefore the appropriate actions are always taken.

Also, a referral has to be made to the Disclosure and Barring Services (DBS) if a person has been dismissed or removed owing to safeguarding concerns, or would have been had they not resigned. This is a legal duty and failure to do so is a criminal offence.

10. USE OF REASONABLE FORCE

"What is reasonable force?"

1. The term 'reasonable force' covers the broad range of actions used by most teachers at some point in their career that involve a degree of physical contact with students.
2. Force is usually used either to control or restrain. This can range from guiding a student to safety by the arm through to more extreme circumstances such as breaking up a fight or where a student needs to be restrained to prevent violence or injury.
3. 'Reasonable in the circumstances' means using no more force than is needed.
4. As mentioned above, academies generally use force to control students and to restrain them. Control means either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of a classroom.
5. Restraint means to hold back physically or to bring a student under control. It is typically used in more extreme circumstances, for example when two students are fighting and refuse to separate without physical intervention.
6. KAA staff should always try to avoid acting in a way that might cause injury, but in extreme cases it may not always be possible to avoid injuring the student.

Who can use reasonable force?
As per the statutory legislation, all members of KAA staff have a legal power to use reasonable force. This power applies to any member of staff at KAA. It can also apply to people whom the Principal has temporarily put in charge of students such as unpaid volunteers or parents accompanying students on an KAA organised visit. Schools do not require parental consent to use force on a student.

When can reasonable force be used?
Reasonable force can be used to prevent students from hurting themselves or others, from damaging property, or from causing disorder.

At KAA, force is used for two main purposes: to control students or to restrain them.

The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.

The following list is not exhaustive but provides some examples of situations where reasonable force can and cannot be used.

KAA can use reasonable force to:
- Remove disruptive students from the classroom where they have refused to follow an instruction to do so
- Prevent a student behaving in a way that disrupts a school event, school trip or visit
- Prevent a student leaving the classroom where allowing the student to leave would risk their safety or lead to behaviour that risks the safety of others
- Prevent a student from attacking a member of staff or another student, or to stop a fight
- Restrain a student at risk of harming themselves through physical outbursts

KAA cannot:
- Use force as a punishment – it is always unlawful to use force as a punishment

Power to search students without consent

In addition to the general power to use reasonable force described above, the Principal and authorised staff can use such force as is reasonable given the circumstances to conduct a search for the following "prohibited items":

- knives and weapons
- alcohol
- illegal drugs
- stolen items
- tobacco and cigarette papers
- fireworks
- pornographic images
- any article that has been or is likely to be used to commit an offence, cause personal injury or damage to property

If a student refuses to co-operate with a search, the member of staff should assess whether it is appropriate to use reasonable force to conduct the search (see listed of prohibited items).

Additional notes

- KAA's extended leadership team have completed certificated training on positive handling, and this knowledge is disseminated across the wider staff body through guidance and modelling, however as above and in accordance to the statutory legislation, all members of staff have a legal power to use reasonable force
- Under common law, school staff have the power to search a student for **any** item if the student agrees. The member of staff should ensure the student understands the reason for the search and how it will be conducted so that their agreement is informed. This includes the search for banned items as listed in the Academy's behaviour policy.
- When a member of staff has had to use reasonable force, they must report the incident using the 'physical restraint' category on CPOMS.

11. EQUALITY IMPACT STATEMENT

We will do all we can to ensure that this policy does not discriminate, directly or indirectly. We shall do this through regular monitoring and evaluation of our policies. On review we shall assess and consult relevant stakeholders on the likely impact of our policies on the promotion of race equality, equality for disabled persons, gender equality and community cohesion using an appropriate Equality Impact Assessment. The policy may be amended as a result of this assessment.

Approved by the Board of Trustees
Signed:
Date:

Review Date
August 2025

12. APPENDICES

APPENDIX 1: Legislative Framework and Statutory Guidance

Keeping Children Safe in Education *(DfE, 2 September 2024)*

Working Together to Safeguard Children *(HM Government, December 2023)*

What to do if you are worried a child is being abused *(HM Government, March 2015)*

Education and Training (Welfare of Children) Act *(June 2021)*

Use of reasonable force: advice for head teachers, staff and governing bodies *(DfE, July 2013)*

Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers *(DfE, May 2024)*

Prevent Duty Guidance: England and Wales' *(Home Office, 2023)*

The Children Act 1989

The Children Act 2004

Data protection in schools *(DfE, February 2023)*

Domestic Abuse Act 2021

Education Act 2011

The Children and Families Act 2014

Special educational needs and disability code of practice: 0 to 25 years *(DfE, 2015)*

Mental health and behaviour in schools *(DfE, November 2018)*

Disqualification under the Childcare Act *(DfE, 2006)*

Working together to improve school attendance *(DfE, August 2024)*

Criminal Exploitation of children and vulnerable adults: county lines guidance *(Home Office, 2023)*

Sharing nude and semi-nudes: advice for education settings working with children and young people *(UK Council for Internet Safety, December 2020)*

Safeguarding Vulnerable Groups Act 2006

The Equality Act 2010

Data Protection Act 2018

The Serious Crime Act 2015

The Voyeurism (Offences) Act 2019

When to call the police: Guidance for schools and colleges *(NPCC, October 2020)*

Advice to schools and colleges on gangs and youth violence *(Home Office, August 2013)*

Searching, Screening and Confiscation: Advice for schools *(DfE, July 2022)*

Support for processing safeguarding concerns and risk

When a safeguarding concern arises, we encourage the safeguarding team to consider the following questions during the triaging stage.

Does the child require medical attention? _(This must always be considered first)_	
Do I need to consult any appropriate internal persons? (E.g. Designated Safeguarding Lead or Deputies, Designated Prevent Officer, Director of Inclusion, Place2Be therapist etc.)	Does Place2Be need to complete a risk assessment for the young person?
Where possible, I need to speak to the parents; is this appropriate or may this place a student at risk of significant harm, impede any police investigation and/or place a member of staff or others at risk?	Do I need to seek advice from the front door team at the relevant local authority?
Do I need to make a referral to children's social care because a child is suffering or is likely to suffer significant harm? If so, does this need to be undertaken immediately?	Do I need to report this to the police?
Is the child safe to go home at the end of the school day or does an alternative plan need to be put in place?	Do I need to discuss the matter with other agencies involved with the family already? (E.g. Early Help practitioner, Social Worker, CAMHS therapist etc.)

APPENDIX 3: Support for reporting a disclosure or concern

It is Everyone's Responsibility to Protect Children and Young People

More than 70% of disclosures are made to non-teaching staff in academies. Academy staff are often the people students will turn to when they want to disclose information about abuse so it is important that we **pass on information quickly** so that others can make the decision on actions.

Definition of Child Abuse

Abuse or neglect of a child by inflicting harm or failing to act to prevent harm

Categories of Abuse

Neglect, Physical Abuse, Sexual Abuse, Emotional Abuse

Neglect

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

This may include:

Lack of adequate nourishment or shelter; Lack of medical attention when needed; Lack of cleanliness or hygiene; Inappropriate clothing; Absence of boundaries

Emotional Abuse

Persistent or severe emotional ill-treatment and or rejection of a child that may or has had an adverse effect on their emotional, behavioural or educational development.

This may include:

Ridicule, rejection, humiliation; Fear or intimidation; Lack of contact with other children; Inappropriate expectations; Low warmth high criticism

Sexual Abuse

Forcing or enticing a child to take part in sexual activities whether or not the child is aware of what they are doing.

This may include:

Actual sexual contact or encouraging children to behave in sexually inappropriate ways by looking at or in the production of pornographic material including on-line activities.

Physical Abuse

Actual physical injury to a child or failure to prevent injury

This may include:

Hitting, shaking, throwing, poisoning, drowning, suffocating, fabricating or deliberately inducing symptoms of an illness in a child.

How to respond to a student who is disclosing abuse

- Reassure the student but don't promise confidentiality
- Ensure the student feels safe - Be aware of your body language, eye contact
- React calmly – Keep responses short, simple, slow quiet and gentle
- Don't interrogate the student: observe and listen, don't put words in their mouth
- Don't stop a student who is freely recalling significant events
- Don't judge the abuser
- Make accurate notes at the time or asap about what has been told, seen or heard

Other forms of Child Abuse

Forced marriages and genital mutilation are considered child abuse in the UK and a grave violation of the human rights of girls and women.

Suggestions of what to say

You're very brave. I believe you. It's not your fault. Well done. I am worried about you. I will need to talk to someone else about what I can do next. You will be asked to share this with someone else.

Don't probe any further than what the student initially wishes to disclose.

Pass on your concerns immediately to the Designated Senior Person, currently Delores McLean-Boyd or Angela Murphy. In their absence speak to any member of SLT. **Do not wait until the end of the day.**

They will then speak to the student themselves.

Keep notes and **Write up** your account immediately

The 3 RRRs : What to do if you are worried that a student is being abused

Recognise: Something gives you cause for concern
Respond: Talk it through with your Designated Senior Person
Refer: The Designated Senior Person **i**nforms the designated safeguarding Professional

APPENDIX 4: Understanding referral process

Member of staff has concerns or a student directly discloses information regarding neglect/physical abuse/emotional abuse/sexual abuse.

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Member of staff reports on CPOMS immediately

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Member of the safeguarding team talks to the student concerned using TED questions: Tell, Explain, Describe.

Case is triaged amongst safeguarding team using Appendix 2 for guidance.

↓

Significant concerns about the student's safety agreed.

↓

Designated staff within SG team contacts social services for advice.

↓

Referral accepted (written referral within 24 hrs). Agree with recipient what the student and parents will be told, by whom and when. Social services decide on next course of action within one working day and feedback to referrer.

↓

Initial assessment confirms concerns about student's safety. A social worker and CP Police may interview the student.

↓

If no emergency action necessary, an initial assessment will be completed within 7 working days and feedback to referrer

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Designated Senior Person informs relevant staff including DOL.

Student not at risk of significant harm. Record disclosure and action.

↓

Discussion with parents. Details minuted and logged on CPOMS.

↓

Referral to an alternative external service may be appropriate.

↓

Situation monitored by the form tutor or relevant member of the safeguarding team to feedback.

Guidance for KAA's Safeguarding Team

This guidance takes into account the non-statutory advice offered in 'Sharing nudes and semi-nudes: advice for education settings workings working with children and young people (March 2024)'.

You are notified of a potential nude or semi-nude image/video of a child. This could be via CPOMS or a student disclosing etc. **PAUSE**

Discuss context with DSL (AGL) or DDSL (RBD/AGN) to construct specific details of action plan/next steps.

Discussion with student/s involved. *Confiscate phone/s - do not search in first instance. Request verbal confirmation re: whether they have this content on their phone/s or not.*

Decide if the DSL needs to search the phone/s. *Must be satisfied that this 'is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved'.*

Decide if a social care referral is required. *Is there a concern that a child has been harmed or is at immediate risk of harm?*

Decide if a separate police report is required. *See the Finkelhor and Wolak grid below. 'Aggravated' incidents always results in a social care referral at minimum.*

Decide if sanctions are required. *Discuss with AGL/RBD and AJN.*

Parent contact for all involved.

Safety planning

If we have decided that other agencies do not need to be involved, we must give consideration to deleting content to limit further sharing.

Remember
- Never share, save or document images of this nature
- The police's role within this is to support children, not criminalise them; ensure the police are referenced to student's throughout this process in this vein
- You may deem a situation to be 'experimental', but wider context needs to be considered to ascertain risk
- The SSO can be used for advice, as can an anonymous consultation with RBKC duty team
- Under KAA's behaviour policy, phone's can be confiscated where needed; if ever in doubt, confiscate and speak to the DSL
- Incidents of this nature can be very traumatic for a parent also; what advice/support can be offered to them?
- Any sanction for incidents like this should be accompanied with an opportunity for education also

Fig 1: Sexting, a typology (Finkelhor and Wolak)
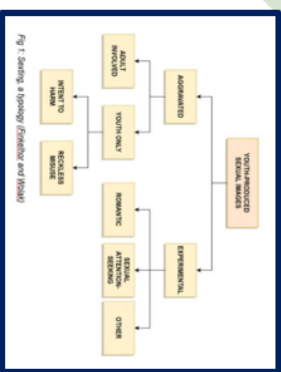
APPENDIX 6: E-Safety

E-Safety Statement

1.1 Digital technologies are integral to the lives of young people both within and outside of the academy. The internet and other technologies are powerful tools which open up new opportunities. Electronic communication promotes effective teaching and learning through the multiplicity of digital and information applications. We believe that access to the internet:

- Enriches the quality of curriculum provision and extend learning activities
- Helps us raise children's attainment
- Supports teachers' planning and resourcing of lessons
- Enhances the KAA's management and administration systems
- Enhances staff development through access to educational materials, as well as the sharing of information and good curriculum practice between Academies, support centres, the LA and DFE

1.2 The requirement to ensure that young people are able to use technologies appropriately and safely should be addressed as part of the wider duty of care to which all those who work in the academy are bound.

2. Purpose

2.1 The purpose of this appendix within the safeguarding policy is to outline the acceptable use of computer equipment and the associated services within KAA. These rules are in place to protect both the employee and the academy because inappropriate use exposes us all to unnecessary risk.

2.2 This appendix addresses the potential risks associated with digital technology which include:

- Access to illegal, harmful or inappropriate images
- Unauthorised access to, or loss of, or inappropriate sharing of personal information
- Access to harmful websites, for example those devoted to weapons production, how to take one's own life or promoting high risk behaviours
- The risk of being subject to grooming via the internet, and possibly meeting high risk individuals off line
- The sharing and/or distribution of personal images without the individual's consent or knowledge
- Inappropriate communication with others including strangers
- Cyber bullying
- Access to unsuitable video/internet games
- The inability to evaluate the accuracy and relevance of information on the internet
- Plagiarism and copyright infringement
- Illegal downloading of files

3. Scope

3.1 This appendix within the safeguarding policy applies to all students, employees, contractors, consultants, temporary employees, volunteers and other workers at KAA.

3.2 This appendix within the safeguarding policy applies to all equipment that is owned or leased by KAA and personal devices used by the above via the academy's secure Wi-Fi.

3.3 This appendix within the safeguarding policy also extends to students and employees who, using their own devices, do so in such a way that may harm or tarnish the image or reputation of the academy.

4. Guidelines

Technical Requirements

4.1 KAA maintains broadband connectivity through the London Grid for Learning (LGfL) and so connects to the National Education Network. (JANET)

4.2 KAA works in partnership with the LA to ensure any concerns about the system are communicated to LGfL so that systems remain robust and protect students.

4.3 KAA automatically receives the benefits of managed filtering service provided by LGfL. This is managed by the IT Manager in order to ensure that the academy meets the e-safety technical requirements outlined in the Security Policy.

- Additional on-site active safeguarding systems at KAA relies on a separate firewall appliance provided by *Smoothwall*. A world leading filtering and monitoring service provider.

- On-site monitoring and control is provided by *Impero Edu Pro*, a management application which actively scans for keywords and alert the IT Team.
- *Smoothwall Monitor* is a separate service used to actively monitor students wherever they are logged in with a KAA managed account. This service works in a similar way to other web filters by using technology to scan for inappropriate access or other risks. Each alert is then moderated by a human team who categorises the incident and alerts the KAA safeguarding team as appropriate.
- *LGfL Home Protect* is used to filter web access for students when off-site. Students logged into KAA managed accounts are protected by the same level of filtering as in school.
- Databases containing categorised keywords are maintained and continually updated by appliance/application vendors. Categories include amongst others: Prevent, Bullying/Harassment, Online exploitation, Self-harm and many more.

4.4 KAA ensures network health through appropriate anti-virus software etc and network set-up.

4.5 KAA ensures the IT Manager is up-to-date with filtering services and policies and checks to ensure that the filtering methods are effective in practice and that they remove access to any website considered inappropriate by staff immediately.

4.6 KAA never allows students access to Internet logs and uses individual log-ins for students and all other users.

4.7 KAA uses teacher 'remote' management control tools for controlling workstations / viewing users / setting-up applications and Internet web sites, where useful.

4.8 KAA never sends personal/sensitive data over the Internet unless it is encrypted or otherwise secured;

4.9 The filtering of internet content provides an important means of preventing users from accessing material that is illegal or inappropriate in an educational context. The filtering system cannot, however, provide a 100% guarantee that it will do so, so education and training and monitoring of activity are required to reduce, as far as possible, the risks to students.

4.10 Employees must use caution when opening email attachments received from unknown senders which may contain viruses. Any concerns in this regard should be reported immediately to the network manager.

Education and Training

4.11 All users of the network receive e-safety training so that they recognise and avoid e-safety risks, building their resilience and understanding of their responsibilities.

4.12 Students receive formal e-safety training through IT lessons, PSHE, assemblies, leaflets etc. E-safety messages are reinforced throughout all curriculum areas.

4.13 The academy provides regular reminders and guidance using staff meetings, email, website and VLE. Staff are also required to read and sign off the ICT Policy.

4.14 The academy provides information and awareness raising sessions for parents and carers through training sessions, the work of the parent association, newsletters, the website and internal TV screens.

4.15 Users should be aware that data and material they create on the corporate system remains the property of KAA.

4.16 All users also receive training in General Data Protection Regulation (GDPR) rules and procedures to understand their responsibility for keeping data secure.

5. Acceptable User Policies

5.1 The academy endeavours to provide all users with good access to IT to support their work, to enhance learning opportunities and, in return, expects staff, students and volunteers to agree to be responsible users. All users are provided with a username and strong password by the IT Systems Administrator (which they must not share with others) at the time they sign the appropriate Acceptable Use Policy.

5.2 The Acceptable Use Policy is intended to ensure that:
- All users will be responsible and stay safe while using the internet and other communications technologies for educational, work, personal and recreational use
- KAA IT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk
- Parents and carers are aware of the importance of e-safety and are involved in the education and guidance of young people with regard to their on-line behaviour
- Parent and carers understand that digital images will only be used to support learning activities or in publicity that reasonably celebrates success and promotes the work of the academy
- Parents and carers agree that if they take digital or video images at, or of, KAA events, which include images of children other than their own, that they will abide by the academy's guidelines in the use of these images. (see Data Protection Policy)

6. Use of Photographic and Video Images

6.1 Students and staff may take and use digital/video images to support educational aims, but must follow KAA policies concerning the sharing, distribution and publication of those images. Images must only be taken on KAA equipment.

6.2 The academy does not allow images of its students and staff to be published on third party websites (i.e. YouTube) unless written permission has been granted. If a student or a member of staff uses third party websites to undermine or bully other members of the academy, they will be sanctioned accordingly.

6.3 Written permission from parents or carers and students must be obtained before photographs of students are published on the academy website or used for publicity that reasonably celebrates success and promotes the work of the academy. Permission is sought using admissions forms and a list of students for whom there is no permission is held by the Data Manager.

6.4 The academy will use digital images of students and staff where it feels it is appropriate to do so. Examples of where they might be used are:
- To celebrate achievement.
- To promote the academy and its work.
- To improve the quality of the learning experience.

6.5 When using any digital image, the academy will ensure that the person's privacy is protected. It will do this by:
- Having the student's permission to publish. This is done through the signing of the home school agreement.
- Not publishing (print or digital) the student's name in a way that could link the name to the image except where parental permission is obtained.
- Not publishing any personal/sensitive details.

6.6 When storing digital media (images, video or audio files) of students or staff within KAA they will be stored safely on a staff area on the academy's network.

7. Use of Social Networking

7.1 Employees and students shall not engage in any social networking or online activity that may harm or tarnish the image, reputation and/or goodwill of KAA and/or any of its employees.

7.2 Employees are also prohibited from making any discriminatory, disparaging, defamatory or harassing comments against KAA or its staff and students when using social networking sites.

7.3 Employees may also not attribute personal statements, opinions or beliefs to KAA when engaging in social networking. If an employee is expressing his/her beliefs or opinions on social networking sites the employee may not, expressly or implicitly represent themselves as employees or representatives of KAA.

8. Communications

8.1 Students are provided with individual KAA email addresses for educational use and must immediately report, to a teacher if they receive any email that makes them feel uncomfortable, is suspicious, offensive, threatening or bullying in nature and must not respond to any such email. This information must be passed to the E-Safety Officer.

8.2 Any communication between staff and students or parents/carers (email, VLE) must be professional in tone and content. These communications may only take place on official (monitored) KAA systems or professional accounts. **Personal email addresses, text messaging or chat and social networking programmes must not be used for these communications.**

8.3 Students and staff should not engage in social conversations with each other via email, text or social networking sites such as Facebook or Twitter.

8.4 Users are made aware, through training, that email and other communications will be monitored.

8.5 Only approved (Whitelisted) external institutions and individuals are allowed to contact students in Year 7 to Year 11.

9. Responding to incidents of misuse

9.1 All members of the KAA community are expected to be responsible users of IT, however, there may be times when infringements of the policy take place, through careless, irresponsible or, very rarely, deliberate misuse.

9.2 There is no tolerance of cyber-bullying, whatever form it takes. Bullying is when a person is deliberately hurt or made to feel unhappy. It is sustained and involves an imbalance of power. Cyber bullying is bullying through the use of communication technology like mobile phone text messages, e-mails or websites. This can take many forms for example:

- Sending threatening or abusive text messages or emails, personally or anonymously
- Making insulting comments about someone on a website, social networking site (e.g.: Facebook), web log (blog) or messaging system.
- Making or sharing derogatory or embarrassing images, videos or audio of someone via mobile phone, email or website (such as 'Happy Slapping' videos or 'sexting').

Using ICT to bully could be against the law. Abusive language or images, used to bully, harass or threaten another, whether spoken or written (through electronic means) may be libellous, may contravene the Harassment Act 1997 or the Telecommunications Act 1984.

To safeguard students, the academy:
- Blocks all "Chat rooms" and social networking sites (that we are aware of or made aware of) except those that are part of an educational network or approved Learning Platform;
- Only uses approved and appropriate blogging or discussion sites, such as those posted on VLE by staff.
- Only uses approved or checked webcam sites;

If members of staff suspect that misuse might have taken place, but that the misuse is not illegal, it must be reported to the IT Manger or E-Safety Officer as soon as possible and will be dealt with through normal behaviour/disciplinary procedures.

If any apparent or actual misuse appears to involve illegal activity the academy will contact the police.

Monitoring and evaluation
- The IT team monitors the impact of the policy using internal logging of incidents, and by surveying students, parents and staff. Any suspicious or inappropriate activity is reported to the appropriate member of SLT.
- This policy is reviewed annually by the member of SLT responsible for e-safety, working with the IT Manager.

Acceptable Use Policy for Students

Academy Policy
This Acceptable Use Policy is intended to ensure:
- That you stay safe while using the internet and other communications technologies
- That KAA IT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk

The academy will ensure that you have good access to IT to enhance your learning and you will agree in return to be a responsible user.

Acceptable Use Policy Agreement
I understand that I must use KAA IT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the IT systems and other users. I recognise the value of the use of IT for enhancing learning and will ensure that I act responsibly at all times.
- I understand that the academy will monitor my use of the IT systems, email and other digital communications I understand that the rules set out here apply to all IT provided by the school (iPads, netbooks, laptops, email, VLE etc) out of school as well as in school
- I understand that the academy IT systems are for educational use only and that I will not use the systems for personal or recreational use
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password
- I will immediately report any illegal or harmful material or incident I become aware of to a member of staff
- I will not access, copy, remove or alter any other user's files
- I will communicate with others in a reasonable manner, I will not use aggressive or bad language and I appreciate that others may have different opinions to my own
- I will ensure that if I take images/videos of others I will only do this if they know about it and have agreed

- When I use my personal hand held/external devices (iPads/laptops/mobile phones/USB devices etc) in school I will follow the rules in the same way as if I was using school equipment. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses.
- I will not upload, download or view anything which is illegal such as pornography or racist materials or anything which could cause upset to others
- I will not use any programmes or software that might allow me to bypass the filtering/security systems in place
- I will not utilise KAA systems for the purposes of gambling
- I will not make large downloads or uploads that might take up intranet capacity and prevent other users from being able to carry out their work
- I will not install or attempt to install programmes of any type on an academy PC or netbook, or store programmes on a computer, nor will I try to alter PC or netbook settings
- I will not disable or cause any damage to KAA equipment, or the equipment belonging to others
- I will immediately report any damage or faults involving equipment or software, however this may have happened
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos)
- I understand that this Acceptable Use Policy applies not only to my work and use of KAA IT equipment, but also applies to my use of KAA IT systems and equipment out of the academy and my use of personal equipment in the academy
- I understand that if I do not follow this Acceptable Use Policy Agreement I could be subject to sanctions which could include exclusion from the academy and the involvement of the police

I have read and understand the policy below and agree to use the academy IT systems, both in and out of the academy) and my own devices (in the academy and when carrying out communications related to the school) within these guidelines.

Name .... Signature ……….……………….………… Date …………………… *

Confirmation of the above is done so electronically upon first sign in as a KAA user.

Acceptable Use Policy for Staff

Academy Policy
New technologies have become integral to the lives of children and young people in today's society, both within the academy and in their lives outside. The internet and other digital information and communications technologies are powerful tools, which open up new opportunities for everyone. These technologies can promote creativity, stimulate discussion and awareness of context to promote effective learning. They also bring opportunities for staff to be more creative and productive in their work. All users should have an entitlement to safe internet access at all times.

This Acceptable Use Policy is intended to ensure:
- That staff and volunteers will be responsible users and stay safe while using the internet and other communications technologies for educational, personal and recreational use.
- That KAA IT systems and users are protected from accidental or deliberate misuse that could put the security of the systems and users at risk.
- That staff are protected from potential risk in their use of IT in their everyday work.

The academy will try to ensure that staff and volunteers will have good access to IT to facilitate their work and enhance learning opportunities and will in return, expect staff and volunteers to agree to be responsible users.

Acceptable Use Policy Agreement
I understand that I must use KAA IT systems in a responsible way, to ensure that there is no risk to my safety or to the safety and security of the IT systems and other users. I recognise the value of the use of IT for enhancing learning and will ensure that students / students receive opportunities to gain from the use of IT. I will educate young people in my care in the safe use of IT and embed e-safety in my work with young people.

For my professional and personal safety:
- I understand that the academy will monitor my use of the IT systems, email and other digital communications
- I understand that the rules set out in this agreement also apply to use of KAA IT systems (eg netbooks, laptops, email, VLE etc) out of KAA
- I understand that the academy IT systems are only intended for educational use and that I not use the systems for personal or recreational use
- I will not disclose my username or password to anyone else, nor will I try to use any other person's username and password
- I will immediately report any illegal, inappropriate or harmful material or incident I become aware of to the appropriate person

I will be professional in my communications and actions when using academy IT systems:
- I will not access, copy, remove or otherwise alter any other user's files, without their express permission
- I will communicate with others in a professional manner, I will not use aggressive or inappropriate language and I appreciate that others may have different opinions
- I will ensure that when I take and/or publish images of others I will do so with their permission and in accordance with the academy's policy on the use of digital/video images. I will not use my personal equipment to record these images, unless I have permission to do so. Where these images are published (eg on the academy website/VLE) it will not be possible to identify by name, or other personal information, those who are featured
- I will only communicate with students and parents/carers using official KAA systems. Any such communication will be professional in tone and manner
- I will not engage in any on-line activity that may compromise my professional responsibilities including making fraudulent offers of products or services originating from a KAA account
- I will not use any programmes or software that might allow me to bypass the filtering/security systems in place
- I will not utilise KAA resources to conduct any commercial or voluntary business unrelated to the academy
- I will not utilise KAA systems for the purposes of gambling

The academy has the responsibility to provide safe and secure access to technologies and ensure the smooth running of the academy:
- When I use my personal hand held/external devices (PDAs/laptops/mobile phones/USB devices etc) in KAA, I will follow the rules set out in this agreement, in the same way as if I was using KAA equipment. I will also follow any additional rules set by the academy about such use. I will ensure that any such devices are protected by up to date anti-virus software and are free from viruses
- I will not use personal email addresses on the KAA IT systems
- I will not open any attachments to emails, unless the source is known and trusted, due to the risk of the attachment containing viruses or other harmful programmes
- I will ensure that my data is regularly backed up, in accordance with relevant KAA policies
- I will not try to upload, download or access any materials which are illegal (child sexual abuse images, criminally racist material, adult pornography covered by the Obscene Publications Act) or inappropriate or may cause harm or distress to others. I will not try to use any programmes or software that might allow me to bypass the filtering / security systems in place to prevent access to such materials
- I will not try (unless I have permission) to make large downloads or uploads that might take up internet capacity and prevent other users from being able to carry out their work.
- I will not install or attempt to install programmes of any type on a machine, or store programmes on a computer, nor will I try to alter computer settings, unless this is allowed in KAA policies
- I will not disable or cause any damage to KAA equipment, or the equipment belonging to others
- I will only transport, hold, disclose or share personal information about myself or others, as outlined in the KAA's Data Protection Policy. Where personal data is transferred outside the secure KAA network, it must be encrypted
- I understand that data protection policy requires that any staff or student data to which I have access, will be kept private and confidential, except when it is deemed necessary that I am required by law or by KAA policy to disclose such information to an appropriate authority.
- I will immediately report any damage or faults involving equipment or software, however this may have happened.

When using the internet in my professional capacity:
- I will ensure that I have permission to use the original work of others in my own work
- Where work is protected by copyright, I will not download or distribute copies (including music and videos)

I understand that I am responsible for my actions in and out of KAA:
- I understand that this Acceptable Use Policy applies not only to my work and use of KAA IT equipment in KAA, but also applies to my use of KAA IT systems and equipment out of KAA and my use of personal equipment in KAA or in situations related to my employment by the academy.
- I understand that if I fail to comply with this Acceptable Use Policy Agreement, I could be subject to disciplinary action. This could include a warning, a suspension, referral to Governors and, in the event of illegal activities, the involvement of the police.
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I have read and understand the policy above and agree to use the KAA IT systems (both in and out of KAA) and my own devices (in KAA and when carrying out communications related to the academy) within these guidelines.

Name .... Signature ……….……………….………… Date …………………… *

Confirmation of the above is done so electronically upon first sign in as a KAA user.

Guidance - What do we do if?

N. B. Children should be confident in a no-blame culture when it comes to reporting inappropriate incidents involving the internet or mobile technology: they must be able to do this without fear.

An inappropriate website is accessed unintentionally in KAA by a teacher or child.

1. Deal with the situation in a calm manner, do not over-exaggerate and attempt not to draw further attention to it.
2. Report to the KAA's Data Protection Officer (Laurence Weeks) who will decide on the appropriate course of action in collaboration with the DSL and Principal where necessary.

An inappropriate website is accessed intentionally by a child.
1. Refer to the ICT policy (student guidance) and apply sanctions in line with the academy's behaviour policy (led by SLT ic. Pastoral)
2. Report to KAA's Data Protection Officer (Laurence Weeks).

An adult uses KAA IT equipment inappropriately.
1. Where possible, ensure you have a colleague with you; do not view the misuse alone.
2. Investigate the problem thoroughly and report any serious misuse immediately to the Principal and ensure that there is no further access to the PC or laptop.
3. If the material is offensive but not illegal, the Principal should then:
- Identify the precise details of the material.
- Complete a full report on the incident.
- Inform governors of the incident.
4. In an extreme case where the material is of an illegal nature:
- Remove the PC to a secure place.
- Document all action taken.
- Contact the appropriate authorities.

A bullying incident directed at a child occurs through email, website, messaging system or mobile phone technology and is in any way connected to the academy.
1. Advise the child not to respond to the message.
2. Secure and preserve any evidence.
3. Report to KAA's Data Protection Officer (Laurence Weeks) and relevant pastoral leadership for further action.

Malicious or threatening comments are posted on an Internet site (e.g. blogs or social networking sites) about a student or member of staff.
1. Inform and request the comments be removed if the site is administered externally.
2. Secure and preserve any evidence.
3. Investigate thoroughly and apply sanctions as appropriate.
4. Inform the Principal who will, depending on the severity of the incident consider informing the police and/or RBKC LSCB

You are concerned that a child's safety is at risk because you suspect someone is using communication technologies (such as social networking sites, email or mobile devices) to make inappropriate contact with the child.

Report to and discuss with the named child protection officers in the academy who will undertake the necessary action.

APPENDIX 7: ACADEMY APPROACH TO DISCLOSURES OF SEXUAL VIOLENCE AND CHILD-ON-CHILD ABUSE

As detailed in Section 4 of the policy, should a young person be at immediate risk of harm, contact with the police and relevant local authority may be required, however the following procedures should be considered where appropriate:

Member of staff has concerns or a student discloses information regarding child on child abuse or sexual harassment

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Member of staff reports on CPOMS immediately

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The member of staff contacts the student via email to arrange a meeting to discuss the disclosure further. The member of staff should **not** pick the student up from lessons without the student agreeing to this.

The student replies to the email and a suitable meeting time and place is agreed. The place of meeting should be private, where other students cannot see in from outside.

The student may not read or respond to their email. The member of staff should ask the student's form tutor to ask them discretely to check their emails.

Member of the safeguarding team talks to the student concerned using TED questions: Tell, Explain, Describe. The victim will **not** be required to write a statement, unless they feel writing would be helpful.

The student still may not reply. The member of staff will discretely meet the student at the end of a lesson and ask them to come and meet them during the transition.

The member of staff will follow Appendices 2 and 4 of the KAA safeguarding policy, to assess whether the students are at risk of significant harm.

The member of the safeguarding team will explain the potential next steps to the victim. These next steps may include, but are not limited to, 1) implications/sanctions for the perpetrator, 2) contact home to both students' parents, 3) restorative justice work, 4) practical changes that can be made by the academy to ensure the victim feels safe, 5) mentoring and follow up work with the victim and perpetrator. **The victim will have ownership over the next steps,** so that they feel in control of the outcomes of their disclosure.

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The victim will be given time, if needed, to consider the next steps to be taken. Their parents will be asked to support them in this. Once the next steps are agreed, the academy will take these, keeping the victim and their family updated on the outcomes.

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The staff member will lead a Circle of Trust session with the victim and their chosen safe friends. The staff member will meet the group of friends and explain the confidential nature of the conversation. This will be an opportunity for the victim to share their experience with their friends and for the friends to offer support.

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A risk assessment will be completed, focusing on the risks associated with the perpetrator's behaviour with regards to this victim and other students.

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Situation monitored by teachers, the form tutor or relevant member of the safeguarding team to feedback.

APPENDIX 8: ACADEMY MANAGEMENT OF SAFEGUARDING FILES

The management of safeguarding files at KAA is done so in alignment with the Academy's Student Privacy Notice and in accordance with the Data Protection Act 1998 and General Data Protection Regulation 2016/679 (from 25th May 2018).

The process by which the academy collects the relevant safeguarding information from feeder schools, whether it be for incoming year 7 students, in year admissions or external sixth form candidates is primarily done so via CPOMS, however given the academy's recent evolvement to a solely electronic system, clarity surrounding this process is detailed below:

- For any student that has left the academy, and in the case that the student's next education destination has not responded to KAA's requests of transfer and attempts of contact, the electronic file remains in the academy's possession indefinitely as per the academy's Retention Policy as can be accessed via the CPOMS archival tool and can be available via a Freedom of Information request (FOI)
- For any student that has left the academy, and in the case that the student's next education destination has not responded to KAA's requests of transfer and attempts of contact, the paper file will have been scanned and stored electronically on CPOMS before being destroyed appropriately. This remains in the academy's possession indefinitely as per the academy's Retention Policy as can be accessed via the CPOMS archival tool and can be available via a Freedom of Information request (FOI)
- The academy stopped storing newly sent paper files from September 2020 and became solely reliant on the electronic storing of files via CPOMS so dependent on the time-frame, the file requested may take the form of a paper file, an electronic file or a combination of both*
- By January 2022, all archived paper files will have been scanned and stored electronically on CPOMS before being destroyed appropriately so any FOI requests from this date onwards will be in the form of electronic records only (the above bullet-point should be disregarded from this date)
- As of September 2020, all safeguarding files that are sent to the academy in paper form are scanned and stored electronically on CPOMS before being destroyed appropriately; all electronic uploads detail when and how the original document was destroyed

To enable us to appropriately safeguard all of our students, it is imperative that we acquire all relevant historical safeguarding context. This is done so in collaboration with the relevant other services including schools and the Local Authority in line with the 'seven golden rules for sharing information' as detailed below:

1. **Remember that the Data Protection Act is not a barrier to sharing information** but provides a framework to ensure that personal information about living persons is shared appropriately.

2. **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.

4. **Share with consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

5. **Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

6. **Necessary, proportionate, relevant, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

7. **Keep a record** of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

The processes followed for acquiring this information is detailed below:

KS2-KS3 Transition (Primary School Handover)
- During the summer term, ahead of the September admissions, the academy collaborates with primary schools and families to acquire the appropriate information. This includes the request of RAG forms from primary schools, visits to the main feeder primary schools and a 1:1 meeting between the parent/carers, student and a member of the leadership team

RAG forms
The template for this form is sent to all primary schools in Sum1 and requests various information for the student including details surrounding attainment, quality of handwriting, punctuality, behaviour etc. In addition, the RAG form requires the primary school to identify if the student falls under a safeguarding category (Early Help, Child in Need, Child Protection or CLA).

Primary School Visits
As many as 12 primary schools are visited every summer term and for any schools that are sending 8 or more students to KAA, the visit is attended by a member of the leadership team, a SEN representative and the Senior Safeguarding Officer. The visits take place after the receiving of the RAG form of which allows the SSO to acquire any further details for those where safeguarding concerns are apparent.

1:1 meetings
The 1:1 meeting is an opportunity for us to get to know our students further and the structure of the meeting includes questions surrounding ability to complete homework, interest in enrichment etc. During the meeting, the member of leadership staff will also ask the parent/carers directly if there are any external services involved with the family.

- All information acquired from the above is stored in a secure, password protected document of which can only be accessed by relevant members of the leadership, pastoral and safeguarding teams
- Any significant safeguarding information that is acquired from the above is transferred and documented on CPOMS by the Senior Safeguarding Officer
- During the latter half of the summer term, relevant members of the leadership, pastoral and safeguarding teams meet to review any relevant information and formulate a plan on how we are to best support the young people when they join the academy and consider any resources they may need; the group of staff then subsequently reconvene in the Autumn term to review actions and progress
- In September, the Senior Safeguarding Officer continually monitors the CPOMS dashboard for any safeguarding files that are sent
- If a primary school uses an alternative electronic system, files are sent to the SSO via Egress and then added to CPOMS
- If a primary school sends a paper file, the file is electronically uploaded and subsequently destroyed as detailed above
- For any primary schools that are yet to send the safeguarding files for their students 5 days after the admissions date, the Senior Safeguarding Officer writes to them directly to request the information
- The SSO continues to take responsibility for this transfer of information as the term progresses and requests support from the DSL where needed

In-year admissions
- The academy's registrar informs the Senior Safeguarding Officer of any in-year admissions
- The SSO liases directly with the previous school to acquire the safeguarding files whether it be via CPOMS transfer, Egress or in paper form

- Should any concerns arise once the file is received, it may be necessary for a member of the safeguarding team or the Director of Learning to meet with a safeguarding lead at the previous school to ensure a detailed handover; this meeting may include parents/carers and external services where appropriate

External Sixth Form students
- The Assistant Principal ic. Sixth Form supplies the Senior Safeguarding Officer with the details of any external sixth form students
- In September, the Senior Safeguarding Officer will continually monitor the CPOMS dashboard for any safeguarding files that are sent
- If the previous school uses an alternative electronic system, files are sent to the SSO via Egress and then added to CPOMS
- If the previous school sends a paper file, the file is electronically uploaded and subsequently destroyed as detailed above
- For any schools that are yet to send the safeguarding files for their students 5 days after the admissions date, the Senior Safeguarding Officer writes to them directly to request the information
- The SSO continues to take responsibility for this transfer of information as the term progresses and requests support from the DSL where needed

Information sharing for those students leaving us in-year or at the end of year 11 to an alternative post-16 provision is done so with careful consideration in alignment with 'Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers', HM Government, July 2018 as below:
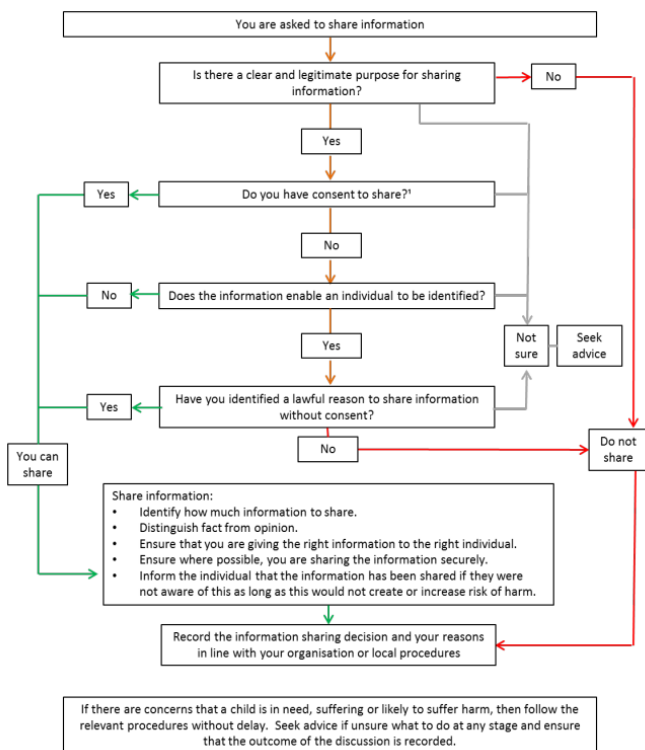
In-year deregistration
- The academy's registrar informs the Senior Safeguarding Officer of any students that are deregistered in-year including details of destination
- The SSO liases directly with the new provision to ensure files are sent via CPOMS or via Egress

- Should a detailed handover of this information be crucial to the student settling at their new destination, a relevant member of the pastoral or safeguarding team will always be willing to meet with relevant staff at the new school and will explicitly suggest this as a requirement if felt appropriate

Year 11 deregistration (alternative post-16 provision transfers)
- The Senior Safeguarding Officer has access to information regarding leavers destinations as compiled by the Careers Advisor
- From September onwards following deregistration, the Senior Safeguarding Officer and Safeguarding Officers proactively contacts the relevant provisions, questions whether the students are definitely on roll and subsequently transfers the files following confirmation
- Handover meetings are carried out with post-16 provisions where felt necessary
- The safeguarding team aim to complete this process within the first 2 weeks of the Autumn Term
- A note is kept for those that do not appear to have accessed education of which is discussed amongst the SSO, Careers Advisor and Senior Data Manager of whom will liase with the LA where concerns surrounding potential NEET is detected

Year 13 leavers
- There is no requirement for safeguarding files to be transferred to any provision beyond year 13 including to any university or apprenticeship provider
- Safeguarding files for those leaving the academy at the end of year 13 are archived on CPOMS as detailed in the initial summary of this appendix

Self Harm
Risk Assessment

Student name:
Date:
Persons present:

Dealing with big emotions can sometimes become extremely challenging and can sometimes lead people into developing unhealthy coping mechanisms. Our priority is to keep you safe so today we are going to look at what things are like for you.

Do you ever hurt yourself, or think about hurting yourself to cope with how you are feeling?
………

If yes, in what way have you hurt yourself?
………

When was the last time you hurt yourself and has this happened previously?
………
………

Have you ever self-harmed in school and if yes, when and where?
………

Can you describe what might have been happening around you at the time that triggered you to self-harm?
………
………

On a scale of 0-10, where are you now regarding self-harm?
0 = I never think of hurting myself
5 = I occasionally hurt myself
10 = I often hurt myself

………

This risk assessment will be linked to your Safety Plan.

Suicide Ideation
Risk Assessment

Student name:
Date:
Persons present:

Dealing with big emotions can sometimes become extremely challenging and overwhelming, causing people to have thoughts of not wanting to live anymore. Our priority is to keep you safe and we want to support you.

Do you ever have thoughts of not wanting to live anymore?

………

When was the last time you had these thoughts?

………

Can you describe what might have been happening around you (triggers) when you were having these thoughts?

………
………

What other situations may cause you to have thoughts of not wanting to live?

………

Do you have a plan as to how you might end your own life?

………

If yes, are you having any thoughts at this moment of acting upon your plan?

………

On a scale of 0-10, where are you now about end your life?

0 = I never think of ending my life

5 = I sometimes wish I wasn't alive and think of ending my life

10 = I intend to end my life and have a plan

………

This risk assessment will be linked to your Safety Plan.

Safety Plan Guidance

All student safety plans are to be created on Provision Mapper using this document for support following a risk assessment.

As a school, our priority is to keep you safe. Now we have a better understanding awareness of how you have been feeling and what you are finding difficult, we are in a better position to support you, so thank you. We are going to consider the things that we can agree on to do this and we all have a role to play. Once we have finished, I will type this up and share with you to ensure we are in agreement and then in 6 weeks, we will review it.

Signposting support
- Papyrus Hopeline – Text 07860 039 967
- Childline – Call 0800 1111
- Samaritans – Call 116 123
- Kooth.com
- ThinkNinja App
- Headspace App
- Calm Harm App
- 101 or 999 in an emergency
- NHS Urgent 24/7 Mental Health Support – 0800 023 4650
- Therapeutic support – CAMHS, Place2Be, MIND, LCAT
- Include phone numbers/email addresses of key people on the safety plan including that of parents/carers and allocated external support workers

Monitoring
- Who will monitor the young person and how frequently?
- Where does the young person have to go to meet with their designated member of staff?
- During this check-in, what discussion will be had? E.g. is a scale used to identify how the young person is feeling? Does a bag search need to be carried out? What happens if the young person articulates that they feel a specific way that day?
- Who does the young person check in with if their designated member of staff is absent?
- Which members of staff will be informed about the young person's challenges? Is a round-robin to oncall or classroom teachers required?

Boundaries
- How does the young person's behaviour at the academy impact our ability to keep them safe?
- If the young person does not follow the safety plan, what are the consequences?
- Are there events or subjects that are temporarily not available to the young person due to the concerns?

Positive habits
- How are parents supporting to ensure the young person is embedding positive habits to support their mental health? E.g. less screen time, exercise, healthy eating, sleeping
- How can the student distract themself?
- What positive factors help to prevent the young person from feeling low? How can we increase these factors and ensure they become a frequent part of the young person's life?