TOGETHER ST PAULS	**Safeguarding & Child Protection Policy**
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Original Author Education Safeguarding Service, Children & Families Directorate, Birmingham City Council.

St. Paul's Trust's Safeguarding & Child Protection Policy is in line with the quality and standards expected from Birmingham City Council and will be monitored by Board of Trustees. This policy will also be reviewed annually or when new legislation requires changes, whichever is the soonest. This policy is approved by the Board of Trustees.

Date approved: 17/09/2025
Chair of Trustees:

Date of Last Review (to be used when policy is updated during the academic year in response to legislative/policy changes): Click or tap to enter a date.

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1. Safeguarding Policy Statement

A whole-Trust, child-centred approach is fundamental to all aspects of everyday life within our school, nursery, youth & play services and within our children's centre. At St. Paul's we strive to create a culture which enables children to express their wishes and feelings and talk about anything that is of importance to them. We believe that every child deserves to receive an education, childcare, play & youth activities within an environment where they feel safe to learn, socialise and develop. We want our pupils, children and young people, staff, parents and carers to have confidence and trust in our goals and know that collaborative working is fundamental to create and maintain a child-centred approach to safeguarding.

In practice this means we endorse the key principle that the welfare of a child is paramount, keeping them at the centre of all decision making in our partnership working with them, their families, and those supporting them.

In line with our duties set out in the Children Act (1989, 2004) and Working Together to Safeguard Children (2023) we are committed to providing support and help as soon as possible, underpinned by our values that children are best looked after within their families, with their parents playing a full part in their lives where possible. We are also committed to ensuring that we work with agencies, including the Local Authority, to access support and targeted interventions for families when we consider that a child is, or may be, at risk of harm.

We hope that parents and carers will support us to undertake our statutory duties to offer early help support and to liaise with agencies to protect children who have suffered or otherwise likely to suffer significant harm without doing so. The core objective of early help support is to prevent any child from being harmed or placed at risk of harm and therefore halt any escalation where possible.

This policy outlines the commitment to our legal duties to safeguard children, the responsibilities for all our staff and the specific roles and responsibilities for our key Designated Safeguarding Leads and Governance.

2. Important Safeguarding Contacts

Organisation / Role	Name	Contact details
Trust wide Designated Safeguarding Lead (DSL)	**Anita Moore Communities Manager**	Anita.moore@stpaulstrust.org.uk 0121 464 1888
Designated Safeguarding Lead (DSL)	**Elizabeth Stevenson – Head Teacher** **Sarah Hyde – Deputy Head**	Elizabeth.stevenson@stpaulstrust.org.uk 0121 464 4376 Sarah.hyde@stpaulstrust.org.uk Sayma.bibi@stpaulstrust.org.uk

	Sayma Bibi – Children's Centre Manager **Fuazia Azad – Early Years Manager** **Tracey Newton – Nursery Manager**	0121 464 6349 Fuazia.azad@stpaulstrust.or.uk Tracey.newton@stpaulstrust.org.uk 0121 464 1886
Deputy Designated Safeguarding Lead (DDSL)	**Alice Legarska** **Covelle Platt** **Sheneh Farrell** **Zara Abbas** **Saima Ahmed** **Jamel Harrison**	School 0121 464 4376
Deputy Designated Safeguarding Lead (DDSL)	**Fatima Khanum** **Harein Qousar** **Nazma Ayub** **Zara Shafiq**	Children's Centre 0121 464 6349
Deputy Designated Safeguarding Lead (DDSL)	**Mariam Bi** **Amber Osborne** **Sharon Healey**	Nursery 0121 464 1886
Deputy Designated Safeguarding Lead (DDSL)	**Gamela Yafai** **Jamel Harrison**	Communities 0121 464 1888
Designated Teacher for Children in Care (DT for Children in Care)	**Sarah Hyde - school**	**0121 464 4376**
Special Educational Needs Coordinator (SENCO)	**Zara Abbas - school**	**0121 464 4376**
Mental Health Lead	TBC	
DSL Prevent Lead	**Sarah Hyde - school**	**0121 464 4376**
Chair of Trustees	**Patrick Wing**	
Vice Chair of Trustees	**Nick Shepherd**	
Safeguarding Trustee	**Carol Herbert (Interim)**	

Non School Contacts

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Duty LADO	Tel: 0121 675 1669 Email:ladoteam@birminghamchildrenstrust.co.uk
Birmingham Children's Trust	Children's Advice and Support Service (CASS)	**Monday to Thursday: 8:45am to 5:15pm:** • Friday: 8:45am to 4:15pm • Telephone: 0121 303 1888 **CASS emergency out-of-hours:** • Telephone: 0121 675 4806
Early Help		Early Help Support Team: Telephone: 0121 303 8117 or contact your Early Help District teams
NSPCC Helpline	N/A	Call: 0808 800 5000 Email help@NSPCC.org.uk.
Police	N/A	Emergency 999. Non-emergency 101

3. Legislation and Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance.

Keeping children safe in education 2024 which sets out the legal duties that all schools and colleges in England must follow to safeguard and promote the welfare of children under the age of 18.

Section 175 of the Education Act 2002,places a duty on schools and Local Authorities to safeguard and promote the welfare of pupils.

The School Staffing (England) Regulations 2009, which sets out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques.

Maintained schools governance guide - 7. Compliance - Guidance - GOV.UK (www.gov.uk) (2024) provides guidance for governing bodies on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, school admissions, school attendance, schools causing concern, school complaints, length of school day and year, opening, closing or making organisation changes to a school, managing school premises, control and community use of school premises, school uniform, staffing and performance management, and whistleblowing.

This guidance is a reference document for those involved in local-authority-maintained school governance. It brings together essential information from a range of sources on the governing body's roles and legal responsibilities.

This policy also meets requirements relating to safeguarding and welfare in the Statutory framework for the early years foundation stage for group and school providers (publishing.service.gov.uk)

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.

Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of pupils at the school.

Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Working Together to Safeguard Children statutory guidance outlines what organisations and agencies must and should do to help, protect and promote the welfare of all children and young people under the age of 18 in England

The Lead Safeguarding Partners for Birmingham Safeguarding Children Partnership are Birmingham City Council, West Midlands Police, NHS Birmingham and Solihull Integrated Care Board, working in close collaboration with Birmingham Children's Trust. They have a joint and equal duty to ensure multi-agency safeguarding arrangements are in place at a local level, and organisations and agencies are clear about how they will work together to safeguard children and promote the welfare of children.

Serious Crime Act 2015, Female Genital Mutilation Act 2003 which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk). All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism"

The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)

The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

Working collaboratively as professionals is a key part of providing services to children and families. When professional disputes happen that cannot be resolved in a timely manner the BSCP Resolution and Escalation Protocol should be followed.

DfE Information Sharing Advice For Practitioners 2024 produced by the DfE, outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes. It also includes the "Seven Golden Rules for Sharing Information," which provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm. It is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their well-being.

4. Definitions: Safeguarding and Child Protection

All our staff at St. Paul's trust are expected to be familiar with the wide range of policies and procedures we must keep our children safe and always promote their wellbeing.

Safeguarding as defined in Keeping Children Safe in Education (2024), means:

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

Working Together to Safeguard Children (2023) further extends this definition to include:

- *promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children*
- *taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.*

Child/ren: The legal definition of a child in the UK includes everyone under the age of 18.

'Early Help' means taking action to support a child, young person or their family early in the life of a problem, as soon as it emerges. It can be required at any stage in a child's life and applies to any problem or need that the family cannot deal with or meet on their own. Early Help Assessment and Our Family Plan - Birmingham Safeguarding Children Partnership

Right Help, Right Time guidance document advises what support is available whatever the needs are of children young people and their families. It the framework and practice guide on how all individuals, agencies, partners and practitioners work together in Birmingham.

Child in Need: Under the Children Act 1989, local authorities are under a general duty to provide services for children in need for the purposes of safeguarding and promoting their welfare. A child in need is defined under section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled. To fulfil this duty, practitioners undertake assessments of the needs of individual children, giving due regard to a child's age and understanding when determining what, if any, services to provide.

Child Protection: Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child who lives or is found in their area is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. Such enquiries, supported by other organisations and agencies, as appropriate, should be initiated where there are concerns about all forms of abuse, neglect, and exploitation whether this is taking place in person or online, inside or outside of the child's home. There may be a need for immediate protection whilst an assessment or enquiries are carried out. Schools are required to cooperate with children's social care when carrying their inquiries and therefore we have a duty to share information when requested to do so.

Significant Harm is the threshold for a child protection response to support and or protect children. Harm is defined in the Children Act 1989 as the ill-treatment of a child or the impairment

of their health or development. This can include harm caused by seeing someone else being mistreated, for example by witnessing domestic abuse. The phrase 'significant harm' was introduced by the Children Act 1989. The Act does not define 'significant.' The question of whether or not harm is 'significant' relates to its impact on a child's health or development.

Children's Advice and Support Service (CASS) provides a single point of contact for professionals and members of the public who want to seek support or raise concerns about a child.

Multi Agency Safeguarding Hub (MASH) is a fully integrated multi-agency team which involves key safeguarding agencies including professionals from social care, police, health and education. These agencies work together to identify the need of children and their families and signpost to the appropriate agency or resources where threshold is met.

The main aim of a MASH is to improve the quality of information sharing when making decisions between agencies at the earliest opportunity.

Children in Care: A child is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a Local Authority approved foster carer.

Kinship Care refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a Kinship Care Strategy to improve kinship carers' financial stability, education, training, and partnership with local authorities and other agencies.

These arrangements can be known as either family and friends care or private fostering.

- **Family and Friends Carers**: If you are a grandparent, aunt, uncle, brother, sister, or family friend looking after a child who cannot be cared for by their birth parents, you are known as a family and friends carer. Sometimes these carers will be given Parental Responsibility for the children through a Child Arrangements or Special Guardianship Order.

- **Private Fostering**: You are a private foster carer if you are not a close relative and you are looking after a child who is under 16 (or under 18 if they are disabled) for more than 28 days in a row.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children and their parents and carers) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what is appropriate and which terms to use on a case-by-case basis.

5. Equality Statement, Children with Protected Characteristics

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. At St. Paul's Trust we are committed to anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers or protected characteristics they may have. As stated in the Equality Act 2010, we recognise the protected characteristics that may be applicable to our pupils:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

All staff and volunteers understand the importance of recognising that a child may benefit from Early Help intervention, and it is integral to our whole school approach to look and listen out particularly for children:

- who have a special educational need and/or disabilities (SEND) or health conditions
- who is a young carer
- who could experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- are asylum seekers
- are at risk due to either their own or a family member's mental health needs
- are in care or were previously in care (see Section 11)
- who have ongoing unexplainable and/or persistent absences from education
- whose parent/carer has expressed an intention to remove them from school to be provided with elective home education (EHE).

Children with Special Educational Needs and Disabilities (SEND)

We know who our children are with special educational needs, disabilities, or additional health needs and recognise that they may face additional barriers, which can include:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's impairment without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- assumptions that children with SEND can be disproportionally impacted by things like bullying - without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased

- a disabled child's understanding of abuse
- lack of choice/participation.

Children in Care (CiC)

The most common reason for a child to become looked after is as a result of abuse and/or neglect. We therefore ensure that the appropriate arrangements are in place to support these children and keep them safe from further harm. This includes:

- appointment of a Designated Teacher (DT) for Children in Care at our school
- appropriate staff made aware of a child's looked after status
- ensure that necessary staff have the skills, knowledge and understanding of the child's needs
- ensure the child's record contains a clear understanding of their legal status and care arrangements, including the levels of authority delegated to their carer and contact arrangements with birth parents or those with parental responsibility
- keep contact details of the child's social worker, carer(s) and name and contact details of the virtual school head for DT to liaise with.

Children with a Social Worker

Virtual School Heads have a responsibility for the strategic oversight of the educational attendance, attainment, and progress of:

- **children in care**,
- **children previously in care**; and
- **children with a social worker** – defined as any child who has been assessed as being in need under section 17 of the Children Act 1989 and currently has a social worker; it also includes those who have been assessed as needing, or previously needing, a social worker within the past 6 years due to safeguarding or welfare reasons.

In line with Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK (www.gov.uk) this has been extended to include:

- **children who have previously had a social worker** – the cohort of children with a social worker and those who have previously had a social worker who are aged from 0 to 18; and
- **children in kinship care arrangements** - this means any friend or family member, who is not a child's parent but raising them for a significant amount of the time, either as a temporary or permanent arrangement.

St. Paul's Trust ensures that our Designated Teacher has the appropriate training, so they are able to take the leadership of this crucial area of our safeguarding arrangements in collaboration with our Designated Safeguarding Lead which includes:

- working closely with virtual school heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- collaborating with the virtual school heads to also promote the educational achievement of children previously in care.

6. Roles and Responsibilities of Staff including Leadership and

Role and Responsibilities of the Whole Trust

Safeguarding is **everyone's** responsibility at St. Paul's Trust. This policy applies to all our staff including permanent, temporary and supply, volunteers, governors and contractors. It also applies to our safeguarding arrangements for extended school and off-site activities for our school pupils.

St. Paul's Trust plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour Policies
- pastoral support system
- planned programme of relationships, sex and health education (RSHE) in an age-appropriate way, which is inclusive and delivered regularly, tackling issues such as:
    - healthy and respectful relationships
    - boundaries and consent
    - stereotyping, prejudice, and equality
    - body confidence and self-esteem
    - how to recognise an abusive relationship (including coercive and controlling behaviour)
    - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - what constitutes sexual harassment and sexual violence and why they are always unacceptable.

Role and Responsibility of all staff (permanent, temporary and supply), volunteers and contractors

Please review ALL information within this section to ensure this reflects your school's arrangements. Please note some bullet points are new.

All staff will be required to:

- read Part One and Annex B of Keeping Children Safe in Education, and the reviewed version of this guidance at least annually. Staff/volunteers who do not work directly with children are not required to read Part One and can be provided with Annex A (a condensed version of Part One) but to promote good practice we recommend that they do so.

  Translated versions of Part One Keeping Children Safe in Education can be found at Keeping Children Safe in Education Part 1 Translations | LGFL for staff, volunteers, parents and carers whose first language may not be English, should they wish to use this

- read Annex B of Keeping Children Safe in Education which outlines important additional information about specific forms of abuse and safeguarding issues to ensure we have a culture that recognises that children within the specific circumstances can be at greater risk of abuse, neglect and exploitation, and a working knowledge to identify indicators

- sign confirmation that they have read the expected sections according to their role, have understood the content and their roles and responsibilities in our whole Trust approach to safeguarding

- promote and raise awareness about the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)

- contribute to creating a culture for pupils who are lesbian, gay, bisexual, or gender questioning to speak out and share their concerns

- contribute to creating a culture for any child defined as having a protected characteristic to speak out and share their concerns (see Section 5).

All staff will be aware of:

- our Trust's safeguarding arrangements and systems which is explained to staff as part of their induction and annual update training. As part of staff induction new staff/ volunteers are provided with the following key guidance and information provided by the Trust's senior leadership team:
    - Safeguarding & Child Protection Policy
    - Staff Behaviour Policy/Code of Conduct
    - the role and identity of the Designated Safeguarding Lead (DSL) and deputies
    - the Behaviour Policy

- online safety policy
- our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
- signs of vulnerabilities to look out for in children who may benefit from Early Help support, we explain to staff the Early Help process for children and their families and what their role is in this to support DSLs in ensuring children and their families receive support as soon as problems emerge
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
  - the process for recording and sharing information internally to DSLs and on children's safeguarding records
  - the process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow
  - the signs of specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) *Keeping Children Safe in Education*
  - how to support and speak to children when they may share their worries or make disclosures of abuse, neglect or exploitation and contribute to creating a culture where children feel able to speak with the relevant safeguarding leads
  - the importance of reassuring children that they are being taken seriously and that they will be supported and kept safe
  - the importance of supporting families and providing a culture of support to encourage parents/carers to seek support and engage with our services and professionals when issues emerge or become a concern
  - children can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online
  - the fact that children who are (or who are perceived to be) lesbian, gay, bisexual (LGBTQ+) can be targeted by other children
  - what to look for to identify children who need help or protection in accordance with statutory procures under the children act section 17 (child in need) and section 47 (significant harm).

Role and Responsibilities of the Designated Safeguarding Lead (DSL)

Our DSL team includes a member/s of our senior leadership team. We also have Deputy DSLs (DDSL) within our staffing group. Whilst one of the DSLs is referred to as the 'lead' and will coordinate the DSL

team, they are all trained at the same level to always ensure that one or more of them are available to carry out all their designated functions in safeguarding.

- The DSL takes lead responsibility for our Trust's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.
- Whilst all of our staff are part of our safeguarding culture, it is the role of our DSL to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise.
- The DSL within settings will act as the main contact when a child and their family are receiving support from any of our services , external agencies and statutory services.
- The Trust has DSLs within each department. Staff are made aware that they can contact any of the DSLs from across the Trust if the ones in their own settings are absent.
- During term time, the school DSL will be available during school hours for staff to discuss any safeguarding concerns.
- In the event that non-urgent matters arise out of school hours, our DSL can be contacted, if necessary **elizabeth.stevenson@stpaulstrust.org.uk.**
- If the school's DSL and deputies are not available or cannot be reached, We provide a rota each holiday with key DDSL information.

The DSL will be given the time, funding, training, resources and support to:

- provide advice and support to other staff on child welfare and child protection matters
- take part in and/or lead early help support
- take part in strategy discussions organised by the Local Authority's Children's Social Care and inter-agency meetings and/or support other staff to do so when required
- contribute to the assessment of children (when a child may have suffered harm or is at risk of harm)
- refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly
- have a good understanding of behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children
- have a good understanding of harmful behaviours that may require risk management, safety planning and/or support, this includes those presented by children within the setting, their parents/carer or associated adults where necessary

- have a good understanding of the filtering and monitoring systems and processes in place at our school
- assist the Headteacher and managers to review and respond to low-level concerns that may arise regarding staff
- share information and/or take part in statutory processes that involve reviewing and analysing of safeguarding practice and policies. This can include meetings held by Birmingham Safeguarding Children's Partnership in response to significant safeguarding incidences, child death and/or where a safeguarding practice review is required to determine learning and practice analysis.

The DSL will also:

- keep the Headteacher and senior managers informed of any issues, the conversations with children and their families, universal services and referrals to external agencies and statutory services
- liaise with universal, targeted and statutory agencies, Local Authority workers (Children's Services and other key practitioners) when there are safeguarding concerns as appropriate (includes early help and child protection)
- share information about incidences of sexual violence and sexual harassment with statutory colleagues such as Police and Children's Social Care colleagues in order to prepare and implement the school's policies
- be confident about what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment
- be aware that children are entitled to have an 'Appropriate Adult' to support and help them in Police investigations or if there is threshold met for them to be searched.

Role and Responsibilities of the Governance

Our Trustees have a strategic role within our leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

The Trustee Board will:

- facilitate a whole-Trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development for the settings
- evaluate and approve this safeguarding and child protection policy along with other policies related to safeguarding at each review, ensuring they comply with the law, and hold the CEO to account for their implementation

- evaluate and approve recommendations/action plans identified through quality assurance activity that the Headteacher/DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the CEO accountable for the practice improvement
- be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our Trust's local multi-agency safeguarding arrangements
- appoint a Truste to monitor the effectiveness of the Trust's safeguarding arrangements including policies and their implementation. This is always a different person from the DSL
- ensure all staff undergo safeguarding and child protection training, including online safety according to their roles, and that such training is regularly updated and in line with statutory guidance.
- ensure that all governors/trustees:
    - read Keeping Children Safe in Education in its entirety, and review compliance of this task at least annually
    - sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance.
- ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
    - making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

The Trustees will make sure:

- the Lead DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
- the Senior DSLs have the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- online safety is a running and interrelated theme within the whole-Trust approach to safeguarding and related policies
- the Trust has effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to child welfare concerns, low level concerns and allegations made against staff
- that this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- where another body is providing services or activities on the Trust sites (regardless of whether or not the children who attend these services/activities are children attending our school and other settings):
    - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed
    - make sure there are arrangements for the body to liaise with the Trust about safeguarding arrangements, where appropriate.
- make sure that safeguarding requirements are a condition of using the Trust premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- the Chair of Governors will act as the 'case manager' in the event that an allegation is made against the Headteacher. where appropriate (see Section 11 Managing Concerns and Allegations)
- all Trustees receive appropriate safeguarding training, including at induction. This training should equip Trustees with the knowledge and skills to understand their safeguarding responsibilities and contribute to a safe school and Early Year's environment as outlined in Keeping Children Safe in Education 2024. Organisations like the National Governance Association and The Key for School Governors offer resources and training to support governors in this area

Role and Responsibilities of the Headteacher & Senior Managers

The Headteacher & Senior Managers will:

- implement this policy and ensure that all staff:
    - are informed of our Trust's systems which support safeguarding, including reading and understanding this policy, as part of their induction
    - follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect
- make this policy available to parents/carers, professionals and the community to ensure there is transparency and clear expectations about the Trust's duty to safeguarding and promote the welfare of children and the arrangements for responding to children presenting with needs that may require early help or support to protect them. The policy ca be found on the Trust's website www.stpaulstrust.org.uk
- ensuring that the DSLs have appropriate time, funding, training and resources, and that there is always adequate cover if the DSLs are absent
- act as the 'case manager' representing the setting in the event of an allegation of abuse made against another member of staff or volunteer; once this allegation has been reported to the CEO and they have agreed for them to act as the 'case manager'.
- manage cases where there are low-level concerns regarding the conduct of staff, or oversee delegation to the DSL and report to HR

- ensuring the relevant staffing ratios are met within our Early Year's and play services
- making sure each child in the Early Years Foundation Stage is assigned a key person
- overseeing the safe use of technology, mobile phones and cameras in Early Years setting.

Role and Responsibilities of the Designated Teacher (School)

Our Designated Teacher takes leadership of promoting the educational attainment of Children with a Social Worker which includes:

- working closely with Virtual School Heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans
- to carry out their duties in line with Designated teacher for looked-after and previously looked-after children - GOV.UK and extended duties as outlined Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK working closely with our DSL for those children who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these children is appropriately entwinned with safeguarding processes.

7. Working with Families

Alongside Keeping Children Safe in Education St. Paul's Trust adopts the fundamental principal of ***working in a child-centred approach within a whole family focus*** as promoted in Working Together to Safeguard Children 2023.

This principle is underpinned by the findings and recommendations within the Government's 2023 publication Stable Homes, Built on Love in response to the recommendations of the Independent Review of Children's Social Care. The strategy sets out how children's social care is to be committed to supporting every child to grow up in a safe, stable and loving home. For most children this means growing up within their family. The strategy also emphasises the importance of having stronger expectations of support through early help and family networks.
At St. Paul's Trust our values align to the above. We endeavor to work in partnership and collaboration with children and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

Our principles include, but are not limited to:
Promoting effective partnership working with parents and carers e.g. build strong, positive, trusting, and co-operative relationships by:

- approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity
- avoiding reinforcing family shame, suffering, and blame
- making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family
- using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change
- ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parent's engagement and use their expertise to adapt their response with care and compassion
- adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled children, and where harm is outside the home
- ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support
- being alert and recognising where parents or carers may not be acting in the best interest of the child or where children may be experiencing abuse, neglect, and exploitation as a result of actions by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement
- being mindful of negative stereotypes when making decisions which might lead to false assumptions.

Communicating effectively verbally and non-verbally by:

- communicating with respect, being clear, curious and inclusive; adapting to parent's and carer's needs
- providing materials to children, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easily understood
- ensuring any materials, such as minutes or reports, capture the Trust's contribution but also those from the children, parents and carers which must include their views and wishes
- supporting families to access support to translate information where English is not their first language. Our school will access interpreters where needed including British Sign Language.

Empowering our parents and carers to participate in decision-making to help, support and protect children by:

- creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements
- ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing
- asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support

- promote families' rights to support through use of advocates, family members or a supporter
- ensuring parents and carers are fully aware of who will attend meetings and discussions, if the child will be invited to participate, and the format of the meeting or discussion
- giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements
- signposting parents and carers to sources of help and support available locally or through the Local Authority
- provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to readapt a family's plans
- being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children
- helping parents and carers to understand what the issues are and how these impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes
- providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them.

8. Confidentiality and Sharing Information

Trusted relationships are at the heart of working with children and their families at St. Paul's Trust. We strive to uphold good practice and work in partnership with children and families, communicating effectively and listening well so that we have sufficient information to understand and be able to meet their needs.

An open culture is imperative when deciding whether to share information and it is important to get the lawful basis right. The legal framework can appear complex, and a lack of clarity can lead practitioners to assume, incorrectly, that no information can be shared because consent has not been provided. The Trust understands the lawful basis in which our DSLs can share information with other people, agencies and organisations about the children and families we are supporting.

In line with our principles of working with families outlined above, we strive to be transparent, open and clear when we need to discuss any information or concerns that worry us about a child's wellbeing. If we feel that we need to share information, we will explain how information will be shared or used so that families can make an informed choice about whether to consent.

If we feel that we need to share information with services due to concerns about a child's safety or welfare to provide the family with specific support, we will be upfront, transparent and honest about our concerns and the ways in which such services could help the family. We will endeavour to support and encourage the family to consent and engage with such support. We believe that this collaborative approach will

support children to have the confidence to speak up and share their views as well as encouraging parents and carers of children at our school to have a willingness to engage with services that provide support.

If we have a concern about a child's safety and have decided to share information to protect them from a risk of harm, we will endeavour to gain cooperation and understanding from parents and carers. We will strive where possible to always gain consent and where we believe our concerns have increased and warrant the sharing of information to statutory services such as Police and Children's Social Care, we will have made efforts to discuss, explore and provide support to address these with families in a collaborative way beforehand; concerns should not be a surprise to families unless in situations where a one off or unprecedented incident occurs.

However, for a small number of children, seeking parental consent is not always possible and may place a child or others at risk of harm, for example:

- the child would be placed at increased risk of significant harm through the action of gaining this consent
- there would be an impact on a criminal investigation
- a delay in making the referral would impact on the immediate safety of the child.

In situations where our professional or legal duty is exercised to share certain information in the absence of consent, we will inform them as soon as possible if it is safe and appropriate to do so. We will be clear about what we have shared, with whom, the reasons why and how the information will be used.

In any situation where a child or their parent/carer object to consent or particular information sharing and we decide that it is proportionate to do so, a clear rationale, outlining our decisions and the reasons why, will be recorded on the child's file.

In situations where there are allegations of child-on-child abuse, we will notify the parents or carers of all the children involved. If a child or group of children have suffered significant harm or are considered at risk of harm either directly or online, we will have a duty to consider making a referral to Children's Social Care and the Police if a crime has been committed. The process for this can be found in Section 9 and our principles for information sharing and consent will apply unless we have a legal obligation to report the incident.

In addition to sharing information, our DSLs will endeavour to arrange a meeting with the parents and carers of all children to share information about the incident, plan safety strategies and/or risk management plans. Our DSLs will endeavour to keep families up to date and provide reassurance on any measures being taken, whilst respecting the privacy of each individual child involved.

The Data Protection Act (DPA) 2018 does not prevent or limit the sharing of information for the purposes of keeping children safe. St. Paul's Trust recognises that timely information sharing is essential for effective safeguarding. Whilst we promote collaboration and partnership with our families, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children when required.

The following principles apply to St. Paul's Trust's confidentiality agreement and Data Protection Policy

- timely information sharing is essential to effective safeguarding.
- the Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe
- if staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- if a victim asks the setting not to tell anyone about the sexual violence or sexual harassment:
    - even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies
    - the DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - the DSL should consider the following points:
        - parents or carers should normally be informed (unless this would put the child at greater risk)
        - the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Children's Social Care where the child resides
        - where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the Police remains.

- regarding anonymity, all staff will:
    - be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
    - consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- have regard for the Government's publication Information sharing advice for safeguarding practitioners - GOV.UK includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information with all relevant parties.

If staff are in any doubt about sharing information, they can seek advice from our Headteacher, Senior Manager, Lead DSL or any of the wider DSL team.

9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)

Abuse, neglect and exploitation

All our staff are aware of what abuse, neglect and exploitation is and have an understanding of the different types of indicators as outlined in Appendix 3 which could suggest a child is suffering or likely to suffer harm.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect and exploitation so that we are able to identify children who may be in need of help or protection at the earliest opportunity.

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

Our staff are aware that children may be abused by an adult or adults or by another child or children.

Physical Abuse
Physical abuse is 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 (Fabricated Induced Illness FII).

Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction
- a child seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying)
- causing a child to feel frightened or in danger
- exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- **Physical contact:** including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- **Non-contact activities:** such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- **Online abuse:** sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse, as can other children.

Neglect

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

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Exploitation

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment.

Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.

- **Child Labour Exploitation:** this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.

- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.

- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

Safeguarding Issues and Specific Forms of Abuse

All our staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, school and any place/space that children occupy or access such as:

- Child abduction
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- County Lines
- Children and the Court system
- Children absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalization
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence
- FGM and the mandatory reporting duty for teachers
- Forced marriage.

Child-on-Child Abuse

At St. Paul's Trust, we know that children can cause harm to other children. As a Trust we have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it could happen here." Our staff are aware that even if no reports are being made in our settings, it does not mean it is not happening.

Our staff understand that it is important to challenge inappropriate behaviours between children that are abusive in nature, and we have clear expectations that incidents are not downplayed or suggested to be jovial or part of growing up as this can lead to a culture of unacceptable behaviours and unsafe environments for children and young people.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Our staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Our staff are aware that domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Female Genital Mutilation (FGM)

Keeping Children Safe in Education (2024) explains that FGM includes *'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.'*

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as 'female genital cutting,' 'circumcision' or 'initiation.'

Our staff are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are

- informed by a girl under 18 that an act of FGM has been carried out on her
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth).

The duty for staff above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, staff know they must report to the DSL who will follow local safeguarding procedures.

Prevent and concerns about extremism

St. Paul's Trust is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of our functions, to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*" (known as the Prevent duty).

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: England and Wales (2023) for England and Wales, especially paragraphs 141-210, which focus on education and childcare. The guidance covers 3 general themes: leadership and partnership, capabilities, and reducing permissive environments.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, which aims to:

- negate or destroy the fundamental rights and freedoms of others; or
- undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- intentionally create a permissive environment for others to achieve the results in (1) or (2)

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

Concerns about mental health

Mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding

concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one.

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must speak to the DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support which includes speaking to the lead for Mental Health in the school or other settings.

If a child is experiencing low moods, low self-esteem and general anxiety, our mental health leads will be able to provide some advice about some self-accessed support through relevant approved wellbeing websites and apps. If, however, the child is presenting with a concerning level of low mood and anxiety for a period of time then our mental health lead in partnership with the DSL will discuss with the child and their parents/carer to explore options of support.

If someone is experiencing suicidal thoughts but they do not need physical input from A&E then consideration will be given to accessing support from the SPA/Crisis team. If a referral for targeted mental health support is required, then a referral through SPA will be made.

If, however, a child/young person is at immediate risk the Trust will recommend they need to be sent to A&E or dial 999.

What all staff need to do to respond if abuse, neglect and exploitation is suspected or been disclosed.

At St. Paul's Trust, we adopt a whole organisation approach and safeguarding is everyone's responsibility. Staff and volunteers, and Trustees must comply with our safeguarding procedures as set out below:

Concerns about child-on-child abuse

In most circumstances, incidences of pupils hurting other pupils within our school will be dealt with under our school's behaviour policy. for other settings their Behaviour Policies will also reflect similar procedures according to age and development of the children involved. Our safeguarding and child protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

- is serious, and potentially a criminal offence
- could put pupils in the school at risk
- is violent
- involves pupils being forced to use drugs or alcohol
- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

If a child makes an allegation of abuse against another child:

- staff must record the allegation and report to the DSL, staff should not investigate the matter
- the DSL will assess and consider the relevant next steps which may include, speaking with the child and parents, accessing relevant consultation lines provided to schools by the Local Authority, making a request for support to Children's Services as well as the Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate
- the DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any children involved, including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond, for example off-site activities and school transport
- the DSL will speak to the child and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs
- if the incident is a criminal offence school/setting have a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting children and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child
- our DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their access to education and our services, although at times some restrictions or adaptations may be required to manage identified risk.

Creating a culture where children feel safe and minimising the risk of all forms of abuse.

We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect and exploitation irrespective of from whom and where this comes from, including child-on-child abuse. Creating a supportive environment where children can feel confident in reporting incidents is key to our safeguarding culture in St. Paul's.

We expect all staff to:

- challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- ensure our curriculum helps to educate pupils about appropriate behaviour and consent

- ensure pupils & children are able to easily and confidently report to their key workers
- reassure victims that they are being taken seriously
- be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems in the school or elsewhere that could be addressed by us updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with our safeguarding partners
- support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, and alleged perpetrator(s) and any witnesses are not bullied or harassed
- consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment.

Our staff are trained to understand:

- how to recognise the signs of child-on-child abuse, and know how to identify it and respond to reports
- even if there are no reports of child-on-child abuse in our settings, it does not mean it is not happening – staff should maintain an open mind and attitude of "it could happen here"
- if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told; and always speak to the DSL should they be unclear
- children may not always make a direct disclosure and therefore they must be aware that:
    - children can show signs or act in ways they hope adults will notice and react to; it may be that their difficulties emerge from behaviour when they do not have the language to express themselves
    - a friend of the child may share information to a staff member or make comments; professionally curiosity is key, do not fear exploring the information and asking open ended questions
    - staff overhear a conversation between children
    - a child's behaviour may change suddenly with no clear reason or precipitating event that might offer some explanation
    - some children can face additional barriers to telling someone, for example they have a disability, special educational need, age gender, ethnicity and/or sexual orientation etc.
    - one child's concerning/abusive behaviour towards another could be an indicator of that child having been harmed themselves.

If a child makes a disclosure to a member of staff or volunteer

All staff are aware they should always be prepared as children can disclose spontaneously to anyone anywhere.

St. Paul's Trust is situated within Birmingham which has a rich and diverse population. We cannot, and do not, assume that all children and their families have the ability, understanding, language and resilience to convey any difficulties they may experience. It is key to our organisation's ethos to recognise the needs of children and their families and to recognise and provide support where English may not be their first language and/or the children or family members have special educational needs; and without doing so may impede their ability to represent their voice, wishes and feelings.

All staff know that we place the voice of children at the centre of everything we do and endeavour to place their best interests at heart. We ensure we know who our children are, staff are encouraged to be curious by speaking and listening to children whilst respecting any protected characteristics. We hope our children have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

Staff also know that children may not always feel ready or know how to tell someone that they are being abused, neglected or exploited and do not always recognise their experiences as harmful.

We listen to children by:

- showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves
- encouraging children to tell their story in their own words
- avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions / prompts.

We reassure children by:

- making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff
- we let a child know it is not their fault as children are often made to feel blame by those harming them
- never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

Recording concerns

Our staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of children. Our staff are clear that they must:

- record all conversations relating to any level of concerns on our recording systems; ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words
- inform the DSL about their concern as soon as possible; where the concern involves a disclosure or concern that the child is at risk of harm they must inform the DSL immediately.
- Our school uses 'Smoothwall' for recording concerns, our children's centre uses Rio and our Early Year's, play and youth services use paper forms. If the level of need on those forms is above Universal Needs they are recorded on a DSL data base which is only
- Our staff are aware that such information is confidential and should be shared with the DSL only who may hold additional information about the child and their family and therefore can form a view on its significance and whether any action is required. Staff will not share information amongst themselves and will not share the information outside of the formal reporting process unless asked to by the DSL. This ensures that information is shared without delay enabling the DSL to carry out any necessary functions of their role whilst upholding confidentiality for the child and their family.

What school and college staff should do if they have concerns about a child

St. Paul's Trust is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children. As outlined above, all our staff are clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them.

Our staff are aware that children can share information with anyone in our settings but there are clear reporting processes when such information sharing raises concern about their welfare. Children may talk about worries and anxieties around friendships and school life which they need to support with but on other occasions they may share information about their family life which indicates that the children and their family may be in need of help and/or fear or experiences which cause staff to be concerned about whether they have been harmed or are at risk of being harmed. Where such situation arises, our staff are clear on the reporting processes.

Any member of staff, including supply teachers, contract workers, volunteers, Trustees and visitors at St. Paul's Trust who has any concerns about a child's welfare should:

- maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality
- reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with
- record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rational for this. Also ensure you make a note of any injuries observed or described by the child (*if it is the latter two*)

- consider if the child needs medical attention and if so, prioritise ensuring they receive this

- you must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the setting's DSL/deputies

- record what the child or other has disclosed in their language or describe what you have seen or suspect and your rational for this (*if it is the latter two*)

The DSL or deputy will:

- use the Right Help, Right Time guidance to initially assess the concerns raised and consider the impact on the child's welfare, at the same time their safety. They will also review the child's record in order to establish if there has been any previous concerns (records help to establish relevant history and risk factors for example even if a concern appears low level on the surface, a series of incidents can highlight patterns of ongoing abuse and neglect.) The DSL will use the Continuum of Need to support their analysis and rationale for any decision

- DSL or deputy will speak to the child to verify their wishes and feelings, contact the child's parents or carers to either inform them of the concerns and also to gauge their view (it will be at the discretion of the DSL team to carefully consider if this action may place a child at further risk, e.g. if the child has disclosed abuse and neglect caused in the family home)

- if it is immediately apparent that a child has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the setting's DSL will make a referral to Children's Social Care to request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police.

What will the Local Authority Children's Social Care do?

Within one working day of a referral being made, a social worker should acknowledge its receipt to the DSL and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required

- any services are required by the child and family and what type of services

- the child is in need and should be assessed under section 17 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process

- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process

- further specialist assessments are required to help the Local Authority to decide what further action to take

- the DSL or deputies should follow up if this information is not forthcoming.

Anyone working/volunteering with children can make a referral, if in an emergency staff are unable to locate or do not have time to inform DSL of a serious concern, the following process must be followed without delay.

Making a referral to Children's Services and/or requesting support

What children and young People need to know and do to report safeguarding concerns (abuse neglect and exploitation)

At St. Paul's Trust we cultivate a culture of openness and transparency and want to make it clear to all our pupils/students that we are available at any time to listen to you and will always take your concerns seriously, however small you may consider them to be.

Our pledge is:

- we will ensure we provide you with the space away from public areas for you to talk

- we will listen without judgement and endeavour to respect your wishes and feelings

- we want you to feel safe and we will be honest about our duty to prioritise your wellbeing and longer term safety, this means, depending on the circumstances, we cannot offer you total confidentiality. We understand that this may create uncertainty, but we are confident that often when matters are dealt with as they emerge the longer-term prospects can be much improved for you and your family

- we will respect your place but if we consider that you have suffered significant harm or are at risk of harm, we will need to share this information so that you and your family can be offered the right support. We will be clear on what information needs to be shared, with whom and how it might be used

- when the concerns suggest you may benefit from early help support this may include considering support to your parents and carers with matters that will improve your situation

- we will provide a named mentor for you so that you can have the confidence and trust to know that you have someone to go to at our school if you are feeling vulnerable and experiencing difficulties. In our other settings this may be a key worker.

- your education and welfare is important to us and we want to reassure you that your experience within our school or setting remains positive and you feel safe.

What you can do to report concerns:

- you can speak to any member of staff of your choice. Those staff will listen and support you but we have a team of DSLs who have a specific role to support children and therefore it is likely that the staff members will talk to them or arrange for you to.

If you are being abused, neglected or exploited you can call Children's Services (the details are on page 4).

If you are in immediate danger and/or think a crime has/is being committed, you can call the Police on **999.**

You can contact the NSPCC Helpline by calling 0808 800 5000 or email: help@nspcc.org.uk

- *Reports can be made to the Headteacher – elizabeth.stevenson@stpaulstrust.org.uk and each school holiday we publish a rota of DSL's and the appropriate phone numbers. We also ensure relevant helpline information is sent to parents and carers*

- *We have a pupil friendly one page version of this policy for display.*

Risk management and safety planning

The DSL, with support from deputy DSL, will take the lead role in managing any proposed risk by the alleged perpetrator(s) and will provide support at the same time, it is not our intention to villainise children, but it is everyone's responsibility to uphold the Behaviour Policy and standards within the Trust to maintain a safe environment. Such assessments or plans will be robust but sensitive to the individual needs of the children to ensure any identified risk is managed as effectively as possible whilst also supporting them to continue accessing a satisfactory level of education.

Risk management strategies can be put in place while other investigations are going on, e.g. by the Police. Although another agency such as the Police or Children's Services is or has investigated an incident, it is our duty here at St. Paul's to ensure we identify and implement our own assessment and management of the concerns, informed by the needs of our school & settings and the children we care for and the advice and outcomes of those agency's actions. This is to ensure that all children and staff are supported and always protected. We will consider these matters on a case-by-case basis, considering whether:

- taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the Police and/or Children's Services to determine this
- there are circumstances that make it unreasonable or inappropriate for us to reach our own view about what happened while an independent investigation is ongoing.

10. Online Safety and Filtering

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers
- protect and educate the whole Trust community to be safe and responsibly use technology, including mobile and smart technology
- set clear guidelines for the use of mobile phones for the whole Trust
- establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education 2024:

Content – being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – online behaviour that increases the likelihood of, or causes harm, for example: making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- the safe use of social media, the internet and technology
- keeping personal information private
- how to recognise unacceptable behaviour online
- ensuring children know not to meet up with a person they have met online without a safe adult
- how to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

We will also:

- train staff, as part of their induction, on how to keep themselves safe online as well as children, in line with the Trust's online safety policy This needs to include issues for example: cyber-bullying, the risks of online radicalisation, and the roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year
- educate parents/carers about online safety through letters and emails sent directly to them. We will also share clear procedures with them so they know how to raise concerns about online safety
- make sure staff are aware of any restrictions placed on them with regards to the use of their personal mobile phone and cameras, *for example that:*
    - *staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present*
    - *staff will not take pictures or recordings of pupils on their personal phones or cameras.*
- make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- make sure all staff, pupils and parents/carers are aware that appropriate staff designated by the Headteacher in our school, have the power to search pupil's phones, as set out in the DfE's guidance on searching, screening and confiscation if there is a concern regarding a child's safety or a crime in which case the Police will be contacted
- put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.
- This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies.

11. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers and contractors

Section 11 of the 2004 Children's Act places an expectation on the Trust to have a clear policy in line with the BSCP Child Protection & Safeguarding procedures for dealing with allegations against staff who work with children. All staff based within our school will be considered to be in either a position of trust or working with children.

A 'position of trust' is one in which a teacher or other member of staff/volunteer is in a position of power or influence over a child, by virtue of the work or nature of activity being undertaken. The Sexual Offences Act 2003 (ss.16-24) and/or Crown Prosecution Service Website sets out detailed definitions and a range of criminal offences associated with abuse of such a position.

A person aged 18 or over is said to be in a position of trust in relation to students at the school/college if they:

- look after children at the school/college. "Looking after" is defined as regularly involved in caring for, training, supervising or being in sole charge of such persons
- a professional who has power and authority in a child's life and may have a key influence on their future is regarded as being in a 'position of trust'
- such a person will have regular contact with the child and may be acting in loco parentis.

The Police, Crime, Sentences and Court Act (August 2022) extended the roles which fall into the definition of 'Position of Trust' within the Sexual Offences Act (2003). The new legislation makes it an offence for anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion to engage in inappropriate relationships with those children/young people.

On receipt of any information which raises a concern about any of our staff, the Headteacher, or Senior Manager, will consider whether the information suggests it is the following:

Allegation is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The threshold for an allegation that is considered by the LADO is wider than those in which there is reasonable cause to suspect a child is suffering, or likely to suffer, harm. The LADO threshold is, in respect of all people working or volunteering with children in a position of trust, where they have:

- 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 may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any information or concern which meets the above threshold should be referred to the LADO service prior to the school taking any action.

Concern about the Quality of Care/Practice is an accusation, not of a child protection nature, that the care/practice provided to a child does not meet the standards expected and is about the level of value

provided by any care/practice resource, as determined by some measurement. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose. These types of concerns should be addressed internally using performance management processes.
Complaint is a statement that something is unsatisfactory or unacceptable. A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.' A complaint therefore can be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action.'
These issues must be addressed through internal complaints policy and procedures.
When concerns/allegations meet the harm threshold St. Paul's Trust is required to comply with both Part Four of KCSiE and also Birmingham Safeguarding Children Partnership procedures manual section Allegations Against Staff or Volunteers

All staff and volunteers at St. Paul's Trust are required to immediately report any level of concerns about behaviour and/or conduct of adult working/volunteering with children towards a child to leadership and management. This includes reporting adults who are providing out of school activities/leasing the Trust's facilities.

What happens next

The CEO must be informed, they can delegate to the Headteacher or Senior Manager who may undertake initial inquiries to gather key information. They will assess whether the allegation meets the LADO threshold, if it does they will make a referral to LADO giving consideration to our staff code of conduct, managing allegations policy and BSCP Allegations Against Staff or Volunteers procedures. If necessary, they will compete a LADO referral within one working day.

If the allegation does not meet the harm threshold for LADO, our Headteacher or Senior Manager will follow the Trust's Low Level Concerns policy.

Role of LADO

- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.
- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** -with the Police, Children's Services and other partner agencies (managers of the subject of allegation).

Role of the Trust's Case Manager, includes:

- clarify facts of the concerns/allegation (not investigate) before contacting the LADO

- take part in Strategy Meetings to liaise with other partner agencies
- undertake internal planned inquiries/fact finding
- take part to review the progress of the case in which there is a Police officer investigation
- operate a thorough disciplinary process when appropriate
- ensure a properly managed conclusion and outcome to process.

LADO Principles and Response

Timeliness - any allegation of abuse must be dealt with fairly, quickly and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers **make a referral to LADO within one working day**.

Objectivity - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

Confidentiality - information about an allegation must be restricted to those who have a need to know in order to:

- protect children
- facilitate enquiries
- avoid victimisation
- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects.

- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as The National Police Chiefs' Council (NPCC)

Concerns that DO NOT meet the harm threshold - Low-Level Concerns (LLC)

The Trust must have a policy in place which outlines the relevant processes and procedures for dealing with concerns raised to them that do not meet the LADO threshold, these concerns are referred to as low-level concerns. The term low-level does not seek to minimise the seriousness of any concerns, the term low-level indicates that it a concern that is lower than the LADO threshold, but they are still practice concerns that need to be considered with a safeguarding lens and require suitable action through internal procedures of the school. It is important these are managed robustly as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

At St. Paul's Trust leadership manage LLC using our internal due process, if we consider a member of staff has breached the Trust's code of conduct, depending on the seriousness and impact on a child, we will also liaise with HR:

- ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- empowering staff to share any low-level safeguarding concerns

- addressing unprofessional behaviour and supporting the individual to correct it at an early stage

- providing a responsive, sensitive and proportionate handling of such concerns when they are raised

- helping identify any weakness in the Trust's safeguarding system.

Our low-level concerns policy is a reflection and extension of the Trust's wider relevant staff behaviour guidance and code of conduct.

Concerns may arise from a range of scenarios, e.g. suspicion; complaint or disclosure made by a child, parent or other adult within or outside of the organisation or as a result of vetting checks undertaken.

All staff should know that in line with our Trust's culture we encourage staff to have the confidence and trust to confine in leadership if they have concerns about adults working or volunteering with children.

We share information responsibly and understand this is on a need-to-know basis

We apply our protocols for recording and storing information confidentially.

We encourage an open and transparent culture, to identify concerning, problematic or inappropriate behaviour early so that we are able to minimise the risk of abuse; and ensure that adults working in or on behalf of the school or other settings are clear about professional boundaries and in accordance with the ethos and values of the institution.

The role of our Trust's case manager and the principles for manging LLC is the same as set out above reporting process parallel to what is set out within the section where concerns meet harm threshold, for example the principles and practice.

If we are uncertain of threshold criteria for either LADO referral or LLC we consult with HR and the LADO. At St. Paul's Trust we have clear codes of conduct and processes in place to deal with any concerns or allegations which do not meet the LADO threshold. Such concerns may arise from suspicion, complaint, safeguarding concerns, or allegation from another member of staff, disclosure made by a child, parent or another outside of the Trust or pre-employment vetting checks.

The Trust has a separate Low Level Concerns Policy

After-school clubs, community activities and tuition: safeguarding guidance for providers
St. Paul's Trust have a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our premises, we will ensure that we follow our Trust's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.
It is the role of our Trustees to ensure any organisation that hires the Trust's premises is compliant with the guidance set out in Out-of-school settings: safeguarding guidance for providers - GOV.UK In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

Other complaints

If any of our stakeholders are not satisfied with any aspects of how we implement and comply with safeguarding policies and procedures, our Complaints Procedures can be found on our website at: https://stpaulstrust.org.uk/complaints/

Whistleblowing

At St. Paul's Trust we strive to create a culture of openness, trust and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the Trust's safeguarding practice and arrangements so they can be addressed appropriately.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Trust's safeguarding procedures and arrangements.

Examples where Whistleblowing may apply:

- pupil's or staff member's health and safety are being put in danger
- failure to comply with a legal obligation or statutory requirement
- attempts to cover up the above, or any other wrongdoing that is in the public/Trust interest
- do not delay! Your concerns should be taken seriously and investigated, and your confidentiality respected
- you should report your concern to the CEO, and if concerns are about the CEO, report to the Chair of Trustees

If, for any reason, there are difficulties with following the above procedure, you can whistle blow directly to Children's Services and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 help@nspcc.org.uk

12. Record Keeping

St. Paul's Trust will hold records confidentially, safely, securely and in line with our Data Retention and Destruction Policy and Retention Schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

Safeguarding records relating to an individual child will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022).

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.

The Trust will follow the Recommendation 17.

Receiving in and transferring pupil records to other education provision

If a child for whom the school or nursery has, or has had, safeguarding concerns moves to another school or nursery the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/nursery to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or
- **the first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school/nursery and provide information to enable them to have time to make any necessary preparations to ensure the wellbeing and safety of the child.

Retention, archiving and destruction of records

For records that are not transferred to another setting, for example the child leaves the country or is going to be home educated, we have:

- a clear retention policy
- secure and appropriate system to archive with restricted access
- we have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

Appendix: Links to useful information

Local:

Birmingham Safeguarding Children Partnership

Birmingham Children's Trust

Birmingham City Council - Children, Young People & Families

BCC Corporate Safeguarding Policy

BCC No Platform Policy | Birmingham City Council

BCC School Safety Plan re children who pose a risk to others

CPR2C Form v2.docx

Use of Artificial Intelligence in education

Generative artificial intelligence (AI) in education (DfE)

Using AI in education: support for school and college leaders (DfE)

Online safety:

NSPCC online-safety-for-schools

National Child Exploitation & Online Safety Centre

Bristol online-safety-and-cyber-crime resources

Hampshire online safety resources

Safer Recruitment:

Staffing and employment: advice for schools (DfE)

Safer Recruitment Consortium guidance

To be added when published:

- Guidance document for educational establishments in Birmingham in the event of a suspected suicide in a school community

- Critical Incident Guidance for Schools

Related Policies: Health & Safety, Behaviour, Equality, Diversity & Inclusion, Data Protection, Data Retention, Information Security, Code of Conduct, Complaints, Dual use, Home Visiting, Mobile Phone, Online safety, Staff Recruitment & Vetting, Volunteers