POLICY NAME
Safeguarding & Child Protection Policy

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Responsible Person	Mike Marshall

POLICY

Key Safeguarding People at Turning Point Academy	
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Designated Teacher for Children Looked After	**Tracy Douglas** **Deputy Principal**
Approved by the Board of Trustees	24th September 2025
Date to Review	September 2026 (at the latest)

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1. Context and Rationale

Safeguarding and promoting the welfare of children and young people is our highest priority. We are committed to creating a safe, caring and supportive environment where every pupil is protected, respected and listened to.

Our approach to safeguarding is underpinned by our core values:

Belong – We ensure pupils feel safe, included and confident to share worries with trusted adults.

Commit – We are committed to robust safeguarding practice, early intervention and working in partnership with families and external agencies.

Thrive – We support pupils' emotional wellbeing and development so they can learn, grow and flourish in a safe environment.

We recognise that our pupils may be more vulnerable due to additional needs. All staff are trained to identify concerns, respond promptly and act in line with statutory guidance to ensure the best possible outcomes for every child.

At Turning Point Academy safeguarding is at the forefront of all we do. We take our role to ensure our pupils are equipped with knowledge, skills and understanding of the modern world, and the risks they may encounter, very seriously. When we need to protect our children and young people from harm, we do so swiftly.

At Turning Point we invest heavily in ensuring that our children and young people have access to a broad and balanced curriculum that includes our 'Life Curriculum' designed to provide a rich and varied offer, so that pupils are able to make safe choices and live happily in a modern, fast paced world. We place high emphasis on developing rounded citizens, with high moral standards.

As part of our investment, our Trustees have put in place a staffing structure that is responsive to changing needs. As a small school, we have a large team of staff dedicated to meeting the pastoral, welfare and safeguarding needs of our school community. These include a full-time school guidance counsellor, three pastoral and welfare managers, a school safeguarding development officer and our school partnerships lead, together with a trained mental health professional who leads on referrals, attendance and family liaison – and all very ably headed up by our deputy principal who has overall strategic responsibility for the school's pastoral and welfare provision.

We are proud that we have developed a culture of being a 'TELLING SCHOOL'. TPA is a safe environment where our children and young people have established and developed close and effective working relationships with staff, resulting in a confidence to speak to staff about concerns about themselves and others, in and out of the school environment.

Turning Point Academy fully recognises the contribution we can make to protect children from harm and to support and promote the welfare of all children who are pupils at our school. This policy applies to all stakeholders; this includes pupils, staff, parents, trustees, volunteers, placement students and visitors.

This policy will give clear direction to all stakeholders about expectations and our legal and moral responsibility to safeguard and promote the welfare of all children at our school.

TPA is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of pupils is at the forefront of all action taken. We recognise that **no single professional can have a full picture** of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. We recognise that we are very well placed to recognise indicators of harm, abuse and low level concerns that may compromise the physical, mental and emotional well-being of our children and young people – after all we spend 6 hours a day with our school community, which we view as a privileged responsibility, unlike many other professionals.

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

- Ensuring that members of the Trustees, the Principal, staff and all stakeholders understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the Designated Safeguarding Lead (DSL). In addition, to ensure that staff are aware that ANYONE can make a referral and understand professional challenge.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Endeavour to provide a safe and welcoming environment where children are respected and valued; where the voice of the child is listened to and is paramount.
- Where it is believed that a child is at risk of or is suffering significant harm, the school will follow the procedures set out by our local Safeguarding Children Partnership arrangements. Reporting & Support – Children's Safeguarding Assurance Partnership (safeguardingpartnership.org.uk)
- TPA has due regard to Lancashire Children's Safeguarding Assurance Partnership (CSAP) Procedures Manual. https://panlancashirescp.trixoline.co.uk/contents/contents;

2. Definitions

The terms **"children"** and **"child"** refer to anyone under the age of 18.

The purpose of this safeguarding policy is to ensure every pupil at Turning Point Academy is safe and protected from harm. The Department for Education (DfE) 'Keeping Children Safe in Education' (September 2025), states safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the 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.

Children can abuse other children. This is generally referred to as **child-on-child abuse** and can take many forms. This can include (but is not limited to) bullying (including cyberbullying, prejudice-based and discriminatory bullying); sexual violence and sexual harassment; physical abuse such as

hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; upskirting; initiating/hazing type violence and rituals; abuse in intimate personal relationships between children; consensual or non-consensual sharing of nudes or semi-nude images or videos, or causing someone to engage in sexual activity without consent.

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

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

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

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

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

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

sexually explicit content, including indecent imagery. This definition does not cover children under the age of 18 sharing adult pornography or exchanging messages that do not contain sexual images.

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

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

"Deep fakes" and "deep nudes" refers to digitally manipulated and AI- generated nudes and semi-nudes.

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

3. Law and Guidance

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

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Education Act 2002
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Victims and Prisoners Act 2024

Statutory guidance

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'

- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- DfE (2025) 'Keeping children safe in education'
- DfE (2023) 'Working Together to Safeguard Children'
- Home Office (2022) 'Domestic Abuse guidance'
- DfE (2023) 'The Prevent Duty Guidance'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2023) 'Academy Trust Handbook 2023'
- DfE (2024) 'Working together to improve school attendance'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2024) 'Information sharing'
- DfE (2024) 'Academy Trust governance'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Recruit teachers from overseas'
- DfE (2024) 'Behaviour in schools'
- DfE (2021) 'Teachers' Standards'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2024) 'Virginity testing and hymenoplasty: multi-agency guidance'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy operates in conjunction with the following school policies:

- School Attendance Policy
- Prevent Duty Policy
- Anti-Bullying Policy
- Safe Touch Policy
- Online Safety Policy
- Data Protection Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Allegations of Abuse Against Staff Policy
- Staff Code of Conduct / Staff handbook
- Behaviour / Relationships Policy
- Managing pupils with medical conditions policy
- Child-on-Child abuse policy
- Low-level Safeguarding Concerns Policy
- Complaints Policy

4. Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil with a **child-centred approach.**

- Contribute to, and maintain a **high safeguarding ethos** within the setting, with safeguarding pupils at the forefront of practice, at all times.
- Ensure ALL children have opportunities to communicate and know that they are **listened to and understood.**
- Contribute to **providing a curriculum** which will equip all children with the skills to keep themselves safe and develop an attitude which will enable them to enter adulthood successfully and reach their full potential.
- Establish effective, supportive, and **positive relationships** with parents, carers, pupils and other professionals.
- Maintain an attitude of **'it could happen here'** where safeguarding is concerned.
- Be proactive to provide a **safe and secure environment** in which pupils can learn.
- Be prepared to **identify** pupils or families who may benefit from **early help**.
- Be aware of the **school's individual procedures** that support safeguarding, including all policies, internal reporting procedures, information and engage with training provided.
- Be aware of the role and **identity of the DSL** and deputy DSLs and seek them for advice if required.
- Undertake **safeguarding training**, including online safety training, during induction and subsequently on a regular basis (at least annually), (which, amongst other things, includes an understanding of the expectations and responsibilities **relating to filtering and monitoring**, including receiving bulletins, emails and briefings. Staff should undertake **Prevent awareness training** at least every two years.
- Be aware of the **local early help process** and understand their role in it.
- Be aware of, and understand, the process for making referrals to Children's Social Care, understanding that **anyone can make a referral.**
- Understand how to make a referral to Children's Social Care and/or the police immediately, if at any point there is **a risk of immediate serious harm to a child**
- Be aware of and **understand the procedure to follow** in the event that a child confides they are being abused, exploited or neglected, in a timely manner.
- Maintain appropriate **levels of confidentiality** when dealing with individual cases.
- **Reassure victims** that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Be aware of **safeguarding issues** that can put pupils at risk of harm.
- **Be aware of behaviours linked to issues** such as drug-taking, alcohol misuse, deliberately missing education, sharing indecent images, extremist behaviours and other signs that pupils may be at risk of harm.
- Be fully aware of the importance of **mental health in relation to safeguarding** and that all staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Be aware that **a pupil may not feel ready** or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Avoid victim-blaming attitudes, and challenge it in a professional way if it occurs.
- Understand the process for reporting **concerns over professional adults**.
- All staff will be aware of the indicators of abuse, neglect and exploitation and will understand that children can be at risk of harm both inside and outside of the school and home, and online. Staff will also be aware that pupils can be affected by seeing, hearing or experiencing the effects of abuse.

Teachers, including the Principal, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the '**Teachers' Standards'.**
- Report, by law, any disclosures of FGM to the police.

The Board of Trustees has a duty to:

- Take **strategic leadership responsibility** for the school's safeguarding arrangements.
- Ensure that the school **complies with its duties** under the above child protection and safeguarding legislation.
- Ensure that all trustees receive **appropriate safeguarding and child protection training**. This should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective. Their training should be updated regularly.
- Ensure that staff **read, understand and follow** part one and Annex B of KCSIE September 2025.
- Ensure a **named Governor takes leadership responsibility** for safeguarding arrangements and receives appropriate training in the management of safeguarding. ***At TPA this person is our Proprietor, Stefan Campbell.***
- Attend **Prevent training** at least every two years.
- Appoint an appropriate member of staff from the SLT to the **role of DSL** and one or more deputy DSLs to provide support and ensure that they are trained to the same standard as the DSL ensuring that the roles are explicit in their job description(s). Ensure the provision of appropriate support, funding, training, resources, and time to carry out their role.
- Support and monitor a **whole-school approach to safeguarding**; this includes ensuring that safeguarding and child protection are at the forefront and **ethos** remains consistently high.
- Ensure **systems are in place so that children to confidently report abuse**, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible. Ensure that the **voice of the child** is heard and acted upon.
- Ensure **effective and appropriate policies** and procedures are in place.
- Make sure that **pupils are taught about safeguarding**, that safeguarding is embedded with the curriculum, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting **pre-employment checks on staff** who work with children.
- Ensure the school has **clear systems and processes in place for identifying possible mental health problems in pupils,** including clear routes to escalate concerns and clear referral and accountability systems.
- Ensure that at least one person on any recruitment panel has undertaken **safer recruitment training.**
- Ensure that **all staff receive relevant safeguarding and child protection training** updates, including online safety and expectations and responsibilities relating to filtering and monitoring systems e.g. emails, as required, but at least annually, including a thorough induction.
- Confirm that there are transparent procedures in place to handle **allegations against staff,** supply staff, volunteers and contractors, including when the school premises are let out to a third party.
- Confirm that there are **procedures in place to make a referral to the DBS** and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been

dismissed or removed due to safeguarding concerns or would have been had they not resigned.

- Ensure that appropriate disciplinary procedures are in place, as well as **policies pertaining to the behaviour of pupils and staff.**
- Ensure that **procedures are in place to eliminate unlawful discrimination**, harassment and victimisation, including those in relation to child-on-child abuse.
- Appoint a **designated teacher to promote the educational achievement of CLA** and ensure that this person has undergone appropriate training.
- Ensure that the **appropriate level of check** is completed on Trustees.
- Create a culture where **staff are confident to challenge** senior leaders over any safeguarding concerns.
- Understand that online safeguarding is an interrelated and running theme through safeguarding practice. Ensure that **children are safe online** by ensuring that **appropriate filters and monitoring systems are in place** and regularly review their effectiveness, understanding those children that are potentially at greater risk of harm, along with the proportionality of costs versus safeguarding risks.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation and prevent the risk of escalation in the future.
- Ensure staff in school are aware of, and policies are personalised to reflect, an understanding of specific issues such as **child-on-child abuse** and safeguarding children with disabilities and special educational needs.
- Partake and complete the **S175/175 audit tool** on a two yearly cycle (at least) as directed by the Local Authority.
- Be aware of their obligations under the **Human Rights Act 1998**, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.
- Ensure that all practice and procedures operate with the best interests of the child at the centre with a **firm child centred approach.**
- Ensure that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children 2023'.

The DSL has a duty to:

- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place, ensuring their effectiveness) whilst creating a culture of safeguarding throughout the setting, continually raising the profile of safeguarding.
- Provide **advice, support and expertise to other staff** on child welfare, safeguarding and child protection matters.
- **Take part in strategy discussions,** inter-agency meetings and Child Protection Conferences and/or support other staff to do so.
- **Contribute to the** assessment of children, and/or support other staff to do so
- Ensure that all staff receive appropriate safeguarding training at induction, including online safety and expectations and responsibilities relating to filtering and monitoring. This updated regularly, at least annually.
- **Be available** during school hours for staff to discuss any safeguarding concerns
- Arrange, alongside the school, adequate and **appropriate cover** for any activities outside of school hours or terms.
- Refer cases:

  - To CSC where abuse and neglect are suspected, and support staff who make referrals CSC.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a **point of contact** with the multi-agency partners.
- Ensure **effective communication** and information sharing (when appropriate) between deputy DSL's/ welfare & pastoral team/ leadership team / Trustees / principal / teachers / staff / SENDCO.
- Liaise with staff when deciding whether to make a referral by **liaising with relevant agencies** so that children's needs are considered holistically.
- Liaise with the **senior mental health lead** and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote **supportive engagement with parents** in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with relevant staff, **taking lead responsibility for promoting educational outcomes** for children, by understanding the lasting impact that adversity and trauma can have on children's behaviour, mental health and wellbeing, knowing the safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
  - Ensuring that the school knows which pupils have or had a social worker
  - Understanding the academic progress and attainment of these pupils
  - Maintaining a culture of high aspirations for these pupils
  - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential
- Ensure that **child protection files are kept updated** and secure, monitoring the quality and accuracy of logs.
- Ensure that a pupil's child protection **file is transferred** as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared to support a child's journey.
- Ensure **all stakeholders understand the Child Protection Policy**, Keeping Children Safe in Education 2025 statutory guidance and internal procedures to report any concerns are transparent and understood by all. Ensure this information is given in **induction** and at regular intervals/ training.
- Work with the board of Trustees to ensure the school's Child Protection and **Safeguarding Policy is reviewed annually**, and the procedures are updated and reviewed regularly.
- Undergo **DSL initial training** and update this training with refresher training at least every two years to remain compliant.
- Ensure opportunities for **further training** and opportunities for upskilling are taken
- Have due regard to the **PACE Code C 2023** in regards to the role of an appropriate adult.
- Encourage a culture of listening to children promoting **the voice of the child**
- **Recognise the importance of information sharing**, including within school, with other schools and with the safeguarding partners and other agencies by understanding relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.

- Undertake **Prevent** awareness training (at least) every two years.
- Be provided with appropriate support and **supervision** in order to carry out the role safely and effectively.
- Liaise with the Local Authority Personal Advisors for any Care Leavers.
- Have due regard to Appendix C of Keeping Children Safe in Education 2025– 'The Role of the Designated Safeguarding Lead'

TPA recognises that Deputy DSL's must be trained to same standard as the DSL.

The designated teacher has a responsibility for promoting the educational achievement of Children Looked After and previously CLA (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. In our setting, this is the Deputy Principal Tracy Douglas.

5. Training and Induction

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

The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Child-On-Child Abuse and Anti-Bullying procedures
- The Staff Code of Conduct
- Part one and Annex B of 'Keeping children safe in education' (KCSIE 2025)
- The Behaviour & Relationships Policy
- The School Attendance Policy, including the safeguarding response to children who have unexplained absences or go missing from education
- Children Missing Education Policy
- Safe Touch Policy
- Restorative Practice procedures and practice
- Appropriate child protection and safeguarding training, including online safety training
- Information about the role and identity of the DSL and deputy DSL(s)
- How to record concerns at Turning Point Academy.

Records will be kept of all inductions

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

- ALL staff, Trustees and volunteers will receive Safeguarding Training (at least) annually. Regular safeguarding themed training is planned through our annual calendar of planned events, ensuring staff re-visit all aspects of safeguarding training on a 2-year cycle. This includes starting the school year with an annual safeguarding update training to keep abreast of any changes to safeguarding policy and procedures.
- The DSL/s will provide ALL staff, volunteers and trustees with regular safeguarding updates.
- ALL staff, volunteers and trustees will read and show an understanding of any updates that are provided.
- DSLs will attend DSL training every 2 years and update their knowledge, skills and understanding of relevant safeguarding issues on a regular basis.

- The DSL, along with Trustees and all staff will undertake Prevent awareness training (at least) every two years.
- That at least one person on any recruitment panel has undertaken safer recruitment training.
- ALL staff, volunteers and trustees will undertake any additional specialised training on matters such as Child Sexual Exploitation, Prevent, Child-on-Child abuse, Online Safety, FGM etc as is deemed necessary by the leadership team/DSL and that is particularly relevant to the context and needs of our school. We recognise that the needs of our school population may change from year to year, or mid-year.
- Any staff member will discuss any specific training requirements or gaps in knowledge or understanding with the DSL/s.
- Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.
- Detailed records will be held of staff safeguarding training and ensure that no training becomes out of date.

6. Multi-Agency Working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements. Further details on www.safeguardingpartnership.org.uk

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

The school will work with Children & Family Well – Being Team, CSC, the Police, Health services and other relevant partners and agencies for the benefit of families and children ensuring contribution to multi-agency plans to provide additional support.

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

TPA also recognises the particular importance of inter-agency working in identifying and preventing CSE and CCE.

- **Information sharing**

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

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

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

7. Early Help

Early help means providing support as soon as the need emerges, at any point in a child's life. Staff at TPA recognise that any professional can provide early help. We are very lucky to have a large pastoral and welfare team employed by the school, as detailed below –

- Mike Marshall – Principal & Designated safeguarding Lead.
- Anthony Riley – Deputy Principal (Pastoral & Welfare) & Deputy DSL
- Ryan Wray – School Guidance Counsellor & Back-Up DSL
- Marc Williams – Safeguarding Development Officer (also trained to DSL standard)
- Rachel Clarke – Referrals, Attendance & Family Liaison Lead (also school mental health lead)
- Mike Nickeas – Pastoral & Welfare Manager
- Emily Parr – Pastoral & Welfare Manager
- Antony Shinks – Pastoral & Welfare Manager
- Steve Grierson – School Partnerships Lead

Any pupil or family may benefit from early help, but staff will be alert to the potential need specifically for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs
- Have SEND, regardless of whether they have a statutory EHC plan
- Have mental health needs
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Are frequently missing or going missing from care or from home
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Are at risk of being radicalised
- Is misusing drugs or alcohol
- Have family members in prison, or are affected by parental offending
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse
- Have returned home to their family from care
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are displaying harmful sexual behaviours which may pose a risk to other children and themselves
- Are persistently absent from education, including persistent absences for part of the school day
- Show any other early signs of abuse, neglect any other identified reason not listed above that requires extra support or intervention to improve outcomes for families and children.
- Have experienced multiple suspensions and are at risk of, or have been, permanently excluded from school, alternative provision or a PRU.
- Have experienced bereavement.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.

Our DSL, Deputy DSL, Back-Up DSL or Safeguarding Development Officer (all trained to the same level), will take the lead where early help is appropriate and consent has been gained. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required to help provide the right, effective support at the right time.

Early Help Assessment - information for professionals - Lancashire County Council

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

We therefore ensure that:

- All staff and volunteers can identify the risk factors that indicate a family or pupil may benefit from Early Help and can follow school procedures to share this with the DSL
- Our DSL, Deputy DSL, Back-Up DSL or Safeguarding Development Officer will undertake a Family Early Help Assessment, when appropriate, to identify what Early Help is required
- DSLs will signpost and refer to appropriate support agencies
- DSLs will lead on TAF meetings where is it appropriate for them to do so
- DSLs will follow the local safeguarding processes and refer to **Working Well with Children and Families in Lancashire** guidance using the Continuum of Need.

8. Abuse and neglect

Abuse is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

Physical abuse is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, biting, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child. Staff are aware of Female Genital Mutilation, a form of Physical abuse.

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

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

Neglect is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger;

failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSL(s), will be aware that safeguarding incidents and/or behaviours can be associated with contextual factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can at risk of abuse or exploitation in situations outside their families (extra-familial harms.)

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, radicalisation and the sharing of indecent images.

ALL staff understand that children who perpetrate abuse or display harmful behaviour should be treated as victims first and foremost and supported in the same way a victim of abuse would be supported - Risk Assessments will be undertaken where a child's behaviour poses a risk to others, themselves or the environment.

ALL staff and volunteers understand that there are specific and emerging ways in which children can be abused and are aware of these specific issues, reporting any concerns, in the appropriate manner to the DSL.

Specific issues include (but are not limited to the following):

9. Domestic abuse

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

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

TPA has commitment to Operation Encompass and informing all stakeholders of the initiative. The lead person for Operation Encompass is Anthony Riley (Deputy Principal & Deputy DSL).

www.operationencompass.org

10. Homelessness

The DSL and deputy DSL(s) are aware of the contact details and referral routes into the Local Housing Authority so that concerns and support over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour

- Any mention of a family moving home because "they have to" or frequent moves.

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

11. Children absent from school

Staff will be aware a child being absent from school is a potential indicator of abuse or neglect and, as such, these pupils are particularly at risk of being victims of harm, sexual and criminal exploitation, forced marriage, female genital mutilation or radicalisation.

The Attendance Officer will monitor daily attendance, identify unexplained absence or concerning patterns, and liaise with the DSL where safeguarding concerns are suspected. The DSL will ensure attendance concerns are considered in all safeguarding assessments and in accordance with the school attendance policy.

Where attendance fails to improve despite early intervention, the school will escalate concerns to the Local Authority Attendance Team and further local escalations procedures, referring to the guidance of LCC working well with Families Threshold guidance.

All staff will receive training on recognising the safeguarding implications of poor attendance and the procedures for reporting concerns, ensuring staff are aware of Working together to improve school attendance.

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

TPA will follow local guidance when children go missing from home
https://panlancashirescp.trixonline.co.uk/chapter/children-missing-from-care-home-and-education

12. Children attending an approved educational activity

An approved educational activity is where a pupil is attending another school at which they are registered or taking part in off-site activity such as field trips, educational visits, work experience or unregistered alternative provision.

Pupils can only be recorded as attending an off-site activity if :

- the place is somewhere other than the school, another school where the pupil is registered, or a place where educational provision has been arranged for the pupil by a local authority under section 19(1) of the Education Act 1996 or sections 42(2) or 61(1) of the Children and Families Act 2014;
- the activity is of an educational nature;
- the school has approved the pupil's attendance at the place for the activity; and
- the activity is supervised by a person considered by the school to have the appropriate skills, training, experience and knowledge to ensure that the activity takes place safely and fulfils the educational purpose for which the pupil's attendance has been approved. Supervision means the pupil is physically supervised by someone who meets this definition.

All relevant school policies continue to apply throughout any approved educational activity. Any activity which is approved will be risk assessed (where relevant) and school will ensure that attendance at any activity is monitored and robust communication is agreed with the provider/accompanying adults.

Remote education is not considered an approved educational activity. As set out in the DfE's guidance on 'Providing remote education', pupils who are absent from school and receiving remote education will be recorded as absent using the most appropriate absence code. School will monitor and record a pupil's engagement with remote education, but this is not formally tracked in the attendance register.

13. Child Criminal exploitation (CCE)

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

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

Specific forms of CCE can include:

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

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

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

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

Criminal exploitation of children can include **County Lines**. This is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or criminal networks / gangs groom and exploit children and young people to carry drugs and money into one or more areas. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered in addition to normal safeguarding procedures. School would liaise with a 'First Responder Organisation' as detailed in part 4 of the guidance, to support and request a referral to the NRM.

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

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

14. Child Sexual Exploitation (CSE)

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

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

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

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

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

All staff will consider the language and terms used when raising concerns and providing ongoing support to pupils who have experienced abuse through exploitation to ensure victims are not unintentionally blamed or seen as active participants in their own abuse.

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

15. Concealed and Denied pregnancy

A concealed pregnancy is when a woman knows she is pregnant but does not tell anyone; or when she tells a professional but conceals the fact that she is not accessing antenatal care; or when she tells another person or persons and together, they conceal the fact from all agencies. A denied pregnancy is when an expectant mother is unaware of or unable to accept the existence of her pregnancy. Physical changes to the body may not be present or be misconstrued; they may be intellectually aware of the pregnancy but continue to think, feel and behave as though they were not pregnant. There may be a number of reasons why a pregnancy is concealed or denied, including, but not limited to; fear of stigma or shame, in cases of rape, sexual or domestic abuse, forced or sham marriage, in cases of rape, sexual or domestic abuse, forced or sham marriage, fear of a child being removed or asylum seekers and illegal immigrants who may be reluctant to come to the attention of authorities. In some cases, the woman may be truly unaware that she is pregnant. In some cases, an expectant mother may be in denial of her pregnancy.

Where there is a suspicion of a concealed or denied pregnancy, the school will follow the procedures set out by our local Safeguarding Children Partnership arrangements.

Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership (proceduresonline.com)

16. Modern slavery

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

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism. (From The Modern Slavery Act 2015, Section 52) The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of slavery or human trafficking': School would liaise with a 'First Responder Organisation' as detailed in part 4 of the guidance, to support and request a referral to the NRM.

17. FGM

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

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

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSC as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

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

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

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

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

18. Forced marriage

Forced marriage is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSC, the police or the Forced Marriage Unit. It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

19. Extremism & Radicalisation

For the purposes of this policy, "extremism" is defined by the government as the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or

2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or

3. intentionally create a permissive environment for others to achieve the results in (1) or (2)

For the purposes of this policy, "radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

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

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

The DSL and the Prevent Lead will undertake the Lancashire Prevent partnership in depth training, available via the Lancashire Prevent partnership website. www.lancashirepreventpartnership.org.uk. All other staff should complete the online Home Office Prevent training as a minimum.

The DSL and the Prevent Lead are able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation and will ensure that all staff and governors have received appropriate and up-to date training that is refreshed at least every two years.

- The Online Safety Policy will support the safeguarding of children online by ensuring they cannot access terrorist and extremist material when using the internet and that suitable filtering and monitoring software and supervision is in place. Systems are regularly tested using technology such as the testfiltering.com filter checking utility, recording the results and addressing as required.

- DSLs understand when it is appropriate to make a referral to the Channel Panel and are aware of how to do so. 'Notice. Check. Share.'

The Prevent duty

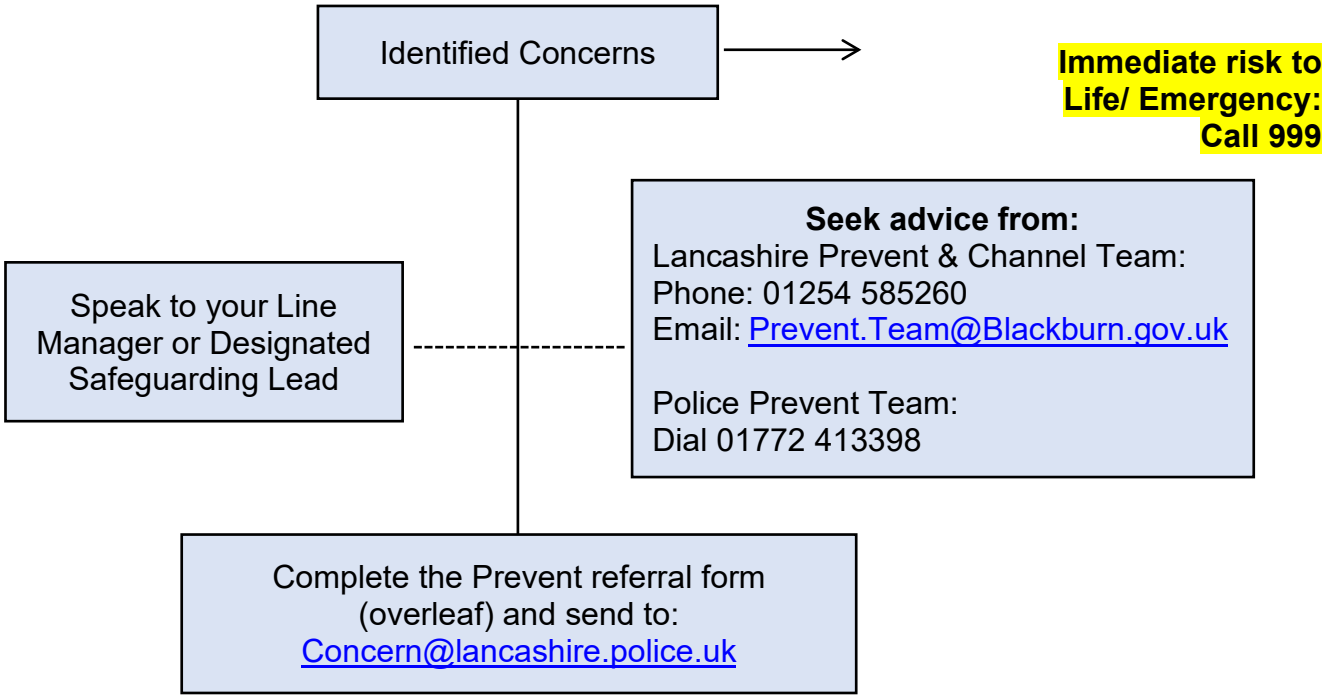
Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as **the Prevent duty,** forming part of the school's wider safeguarding obligations.

TPA will ensure that ALL Staff, Trustees and volunteers are informed and have 'due regard to the need to prevent people from being drawn into terrorism', known as the 'Prevent Duty' and follow guidance from *www.lancashirepreventpartnership.org.uk*

Prevent referral process -

Prevent is one of the elements of CONTEST, the UK government's counter- terrorism strategy and aims to stop people becoming terrorists or supporting terrorism.

- Prevent initiatives tackle both the causes and risk factors that can lead someone to become radicalised. It directly supports those who are at risk through early intervention, is resourced to risk and addresses all forms of terrorism and extremism. Prevent works in a similar way to other safeguarding processes designed to protect individuals whereby the level of intervention increases with the level of risk.
- Radicalisation is the process by which a person comes to support terrorism and in some cases may then participate in terrorist activity. There is no single process or indicator of when a person might move to adopt violence in support of extremist ideas. The process is different for each individual and can take place over an extended period or a short time frame.
- Extremism is defined as, vocal or active opposition to British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of the armed forces here or abroad.
- If you notice a change in an individual that concerns you, in that they may be vulnerable to radicalisation, follow your organisation's safeguarding policy/ Prevent & Channel referral process.
- Check your concern with a manager or designated safeguarding lead and contact the Prevent team for advice.
- Share the concern with the police by completing the Prevent referral form.
- Referrals will be screened for suitability through a preliminary assessment by the police. If suitable for multi-agency consideration, it will be passed to the local authority Channel team.



Prevent Lead	Mike Marshall (Principal & DSL)
Prevent Governor Lead	Stefan Campbell (Proprietor)
Prevent Curriculum Lead	Hannah Griffiths (Assistant Principal)

20. Private fostering

Private fostering occurs when a child under 16 years old (or under 18 if they have a disability or special educational needs) lives with someone who is not a close relative for 28 days or more. If a UK homestay lasts 28 days or longer, it may also be considered private fostering under the Children Act 1989.

When a school becomes aware that a pupil is being privately fostered, they must inform Children's Social Care (CSC) promptly so that the local authority can carry out the necessary checks and ensure the child's welfare.

https://lancashiresafeguardingpartnership.org.uk/p/toolkits/private-fostering

21. Pupils with family members in prison

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

22. Child-on-Child abuse including sexualised abuse

Child-on-Child abuse is defined as abuse between children under 18 years of age.

TPA has a **zero-tolerance approach to abuse**, including child-on-child abuse.

TPA will refer to the specific guidance in Keeping Children Safe in Education Part five: Child on Child Sexual Violence and Sexual Harassment and Lancashire Procedures. 5.31 Peer Abuse (proceduresonline.com)

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

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

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

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

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

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

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

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

The school's procedures for managing allegations of child-on-child abuse are outlined in the School Behaviour & Relationships Policy/ Anti – Bullying Policy / Child on Child Abuse Policy.

TPA's DSL's will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school or college staff
- contextual safeguarding issues.

Following a report of sexual violence, the designated safeguarding lead (or deputy) will make an immediate risk and needs assessment, considering:

- the victim
- the alleged perpetrator
- all other children (and if appropriate adult students and staff)
- Risk assessments (if required) will be recorded and kept under review as a minimum termly
- Refer to Guidance in Keeping Children Safe in Education Sept 2023, Part 5.

Where relevant, risk assessments will be written, informed by the voice of the children involved, consulted on with parents / carers and shared on a need to know basis with relevant staff and kept under review as a minimum, termly.

23. Serious violence

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

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

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

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

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

24. Online Safety

Turning Point Academy will adhere to the Online Safety Policy at all times and is committed to keeping children safe online. The school recognises that addressing online safety issues should form an integral part of the school's safeguarding arrangements.

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

The school will ensure that suitable filtering and monitoring systems are in place on **ALL** school owned ICT equipment (including school-owned mobile devices) to mitigate opportunities for children to

access inappropriate material. These arrangements will be regularly monitored and reviewed for effectiveness with any inappropriate behaviours or searches being followed up appropriately.

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

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

Staff will be aware that ongoing in-person monitoring is required in addition to the software in place as it is vital staff don't rely solely on IT systems as this may leave some children vulnerable.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction and at regular intervals.

- **Personal electronic devices**

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the [Staff Code of Conduct, Behaviour & Relationships Policy & Mobile Phone Policy.

Where photographs and videos will involve pupils who are CLA, adopted pupils, or pupils for whom there are security concerns, the Principal will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are CLA or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

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

School will therefore ensure that:

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

- **Upskirting**

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

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

25. Sharing nude and semi-nude images

Formerly referred to as 'Sexting', sharing nudes and semi-nudes is defined as *the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums.* (UKCIS, 2020)

UKCIS – Sharing nudes and semi-nudes: advice for education settings (UKCIS, 2020)
https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

The school will ensure that all staff are aware to treat the sharing of indecent images as a safeguarding concern.

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

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

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

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

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

- **Aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes;- including where there is an adult involved, where there is an intent to harm the pupil or where the images are used recklessly.
- **Experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse.

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

- never copy, print, share, store or save them; this is illegal;
- discuss the decision with the Principal or a member of the senior leadership team;
- make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the Principal or a member of the senior leadership team;
- make sure viewing takes place with another member of staff present in the room, ideally the Principal or a member of the senior leadership team;
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the Principal or a member of the senior leadership team's office;
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images;
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions;
- if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called.

The above summarised points are explained in further detail with important supporting guidance in the UKCIS guidance – Sharing nudes and semi-nudes: advice for education settings

- **Sextortion**

There has been a large increase in reports of children and young people being forced into paying money or meeting another financial demand after an offender has threatened to release nudes or semi-nudes of them. This is financially motivated sexual extortion, a type of online blackmail often referred to as 'sextortion.' It is a form of child sexual abuse. TPA will ensure that staff are aware that this can happen and the school will follow guidance issued by the National Crime Agency.

26. Context of safeguarding incidents

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

27. Pupils potentially at greater risk of harm

TPA recognises that some groups of pupils can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

- **Pupils who need social workers**

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL within each school will hold and use information from their LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare and educational outcomes, e.g. considering the provision pastoral or academic support and support with behaviour.

- **Home-educated children**

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2024, TPA will ensure it informs their LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from a school within the trust for EHE, the school and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

Where children are removed from roll for Elective Home Education and there are safeguarding concerns, school will ensure that concerns are shared with the LA.

- **Children Looked After (CLA)**

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. Previously CLA, also known as care leavers, can also remain vulnerable after leaving care.

The school will ensure that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

- **Pupils with SEND**

When managing safeguarding in relation to pupils with SEND, staff within the trust and its schools will be aware of the following:

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

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

- **LGBTQ+ pupils**

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. All staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

- **Adverse Childhood Experiences and trauma**

We acknowledge that children who have experienced adverse childhood experiences and trauma may be at increased risk of developing health and social difficulties.

All staff will be made aware of the long-lasting impact of experiencing adversity and the lasting effect trauma can have on a child's development.

Where a pupil is known to have experienced trauma, appropriate arrangements will be made to provide support based on the needs of the pupil and in line with all relevant guidance and policies. This may include close multi-agency working with external services.

28. Extracurricular activities and clubs and use of school premises by external organisations

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

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

TPA will always consider safeguarding arrangements when an extracurricular activity or club is arranged in view of DSL availability or ensuring that a transfer of control document has been completed for external agencies and the school is satisfied that the agency has appropriate safeguarding policies and procedures in place.

Where the board of trustees hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances. The school will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the board of trustees provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the trustees and DSL will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The trustees will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The trustees will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

29. Alternative provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain or conduct written checks that the provider has conducted all relevant safeguarding checks on staff, have effective policies and ensure clear communication procedures in place in view of attendance. The checks will be regularly updated and stored centrally.

30. Managing referrals

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

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

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

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSC. Where CSC decide that a statutory investigation is not appropriate, the school will consider referring the incident again

if it is believed that the pupil is at risk of harm. Where CSC decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

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

Escalation Procedure

If the school are dissatisfied, local escalation procedures will be followed. Conflict Resolution Policy.

The lead DSL at TPA is the person with responsibility to escalate any concerns or issues to the appropriate authority.

31. Concerns about staff and safeguarding practices

If a staff member has concerns about another member of staff (including supply staff, volunteers and persons who use/hire the school premises), it will be raised with the Principal. If the concern is with regards to the Principal, it must be referred to the Proprietor, Stefan Campbell.

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

32. Allegations of abuse against staff and low-level concerns

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

All allegations against staff, supply staff, volunteers, contractors and any person who may use or hire the school premises, will be managed in line with the school's Whistleblowing Policy – a copy of which will be provided to, and understood by, all staff at induction. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns". Allegations that meet the harms threshold include instances where staff have:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

All staff at TPA are aware of these procedures and aware of the following expectations and protocol:-

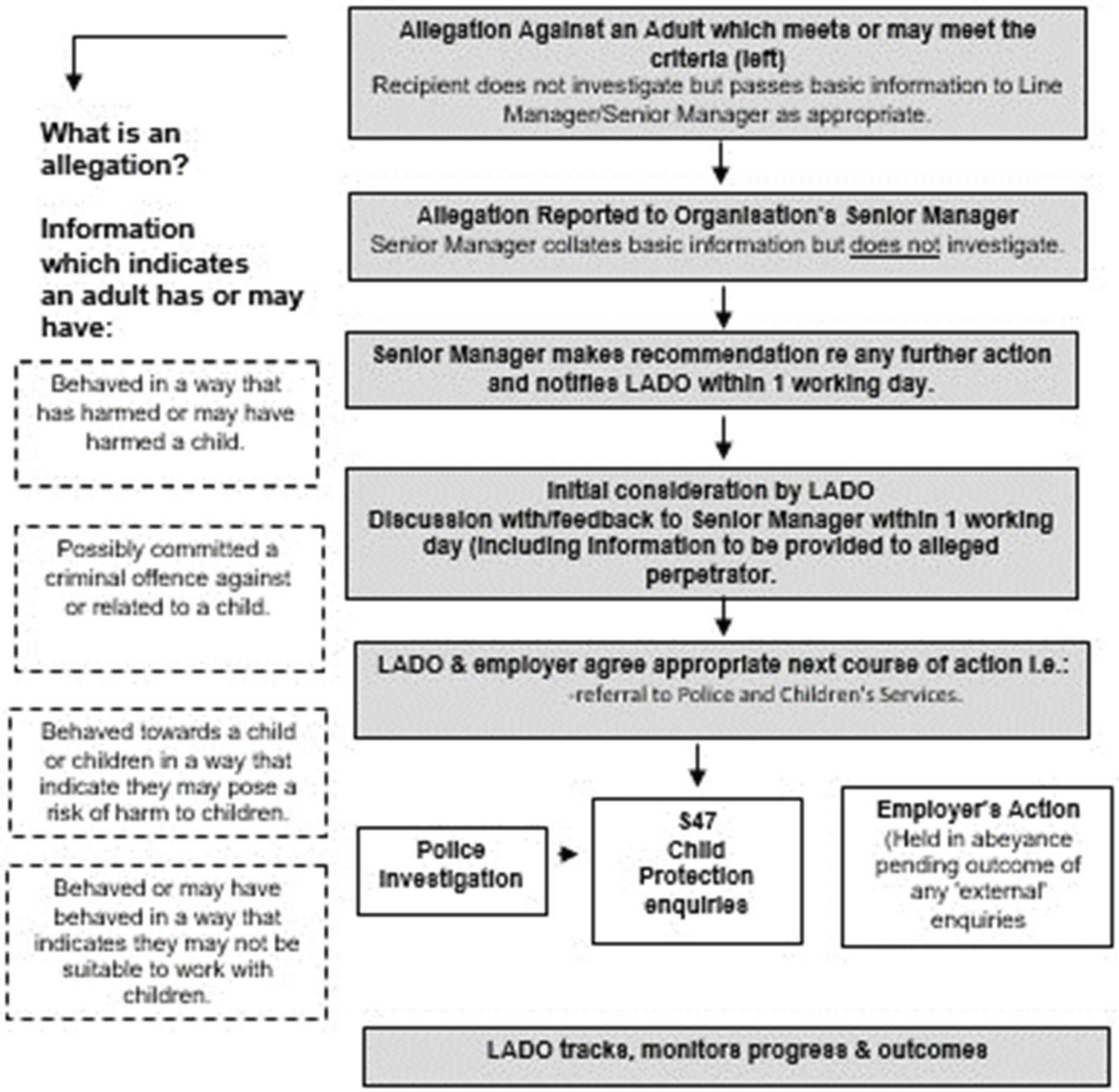
- ALL staff and volunteers are aware that they must refer allegations or concerns around staff (including supply staff) conduct to the Principal.
- ALL staff and volunteers are aware of the requirement to, and process of referring allegations or concerns around the Principal to the Proprietor and how to contact them.

- The Principal and/or Chair of Trustees will discuss the allegation with the Local Authority Designated Officer (LADO) when they feel the threshold of harm has been met.
- CSAP procedures for dealing with allegations against staff will be followed Allegations Against Staff or Volunteers.
- ALL staff and volunteers remember that the welfare of the child is paramount and that they have a duty to inform the Principal if any adult's conduct gives cause for concern.
- All staff recognise the importance of sharing and reporting low-level concerns (see below guidance on low-level concerns) surrounding staff or any adult in a position of trust to the Principal.
- ALL staff are aware of the school's Whistle Blowing Policy, which enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.
- Staff are fully aware of Guidance for Safer Working Practice 2022 and the Staff Code of conduct & Staff Handbook. They are aware of professional expectations of their own behaviour and conduct.
- Further information, LADO referral information and flowchart of how allegations are managed: Local Authority Designated Officer (LADO) - Lancashire County Council includes the threshold matrix.
- Referrals will be made using the required format below when necessary. https://my.apps.lancashire.gov.uk/w/webpage/request?form=management_of_allegations_notification

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

Blackburn with Darwen	Blackpool	Lancashire
01254 585 184	01253 477558	01772 536 694
LADO@blackburn.gov.uk	lado@blackpool.gov.uk	LADO.Admin@lancashire.gov.uk

Flowchart: Procedure for Managing Allegations



Remember: The LADO must be contacted when you have received any allegation or concern about any person who works with children who may have. -

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

- **Low Level Concerns**

TPA ensure that all staff are aware of how to recognise and report **low level concerns** around staff behaviour or conduct.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

• is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and

• does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

• being over friendly with children

• having favourites

• taking photographs of children on their mobile phone, contrary to school policy

• engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or

• humiliating pupils.

Turning Point Academy will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers, contractors or those that have hired/let the premises) are dealt with promptly and appropriately. TPA will strive to embed a culture of openness, trust and transparency in which our school's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

TPA will ensure that staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All staff are clear on how to report low level concerns and will be empowered to do so. Staff must report their concerns to the Principal – Mike Marshal, or a member of the school's leadership team (one of the Deputy Principals or Assistant Principals). It is important to note that if the Principal is not informed directly, they will always be kept informed of a low level allegation in a timely manner, by the leadership team member that was originally informed. If concerns are surrounding the Principal, this must be referred to the Proprietor (Stefan Campbell). Guidance from Keeping Children Safe in Education, September 2025, will be followed in view of recording and storage of such concerns.

If in doubt whether the concern is a low-level concern, the Principal consult with LADO for guidance.

The Trustees will ensure low level concern procedures and staff behaviour expectations are clearly addressed within the staff code of conduct and procedures are implemented effectively, ensuring that appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

33. Safer recruitment

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

- Keeping Children Safe in Education, September 2025, Part 3 guidance is adhered to, to ensure that there is a strong reference and commitment to safeguarding during advertisement, selection and recruitment of new staff.

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

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

The board of Trustees will conduct the appropriate pre-employment checks for all prospective employees.

School will ensure that:

- The appropriate DBS and suitability checks will be carried out for all trustees, volunteers, and contractors. The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

- The original DBS certificate is seen for all appointees to the school, even where the on-line DBS system indicates that the check is clear.

- There are sufficient staff/Trustees who have undertaken appropriate Safer Recruitment training in the last 5 years and reached the required standard as verified by the course facilitators, to enable at least one person on every recruitment panel to be appropriately trained and there are at least 2 people on each selection panel.

- Written assurances will be obtained from agencies and other employers that provide staff to work in school, to confirm that appropriate pre- employment checks have been undertaken in line with Keeping Children Safe in Education, September 2025.

- Individual identity checks will be undertaken on those staff detailed above to ensure they are employees of the named agency/employer.

- Conduct an online search as part of our due diligence on shortlisted candidates in line with KCSIE 2025 requirements. This may help identify any incidents or issues that have happened and are publicly available online and will inform shortlisted candidates of this procedure.

- A transfer of control agreement will be used where other agencies/organisations use school premises and are not operating under school's safeguarding policies and procedures.

- Adults who are involved in the management or provision of childcare of children in Early Years, or in out of school provision for children up to 8 years old, will make a declaration that they are not disqualified under the Child Care Act 2006.

- When an issue is declared, advice will be sought from Ofsted about the need to apply for a waiver. If a waiver is necessary, a risk assessment will be carried out and proportionate measures put in place until a waiver has been issued or matters resolved. If it is not resolved, this must be reported:- disqualification@ofsted.gov.uk

- Advice will be sought from Human Resources, LADO and/or Schools Safeguarding Officers if any staff are unclear about any aspects of Safer Recruitment.

- **Referral to the DBS**

There is a legal requirement for schools and colleges to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

• engaged in relevant conduct in relation to children and/or adults, and/or

• satisfied the harm test in relation to children and/or vulnerable adults, and/or

• been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

- **Single central record (SCR)**

The school keeps an SCR which records all staff, including agency, third-party supply staff and teacher trainees on salaried routes, who work at the school, even if they work for one day.

All members of the Board of Trustees are also recorded on the SCR.

The following information is recorded on the SCR:

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

If any checks have been conducted for volunteers or Trustees, these may also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, (with/without a barred list check, depending on whether they are in regulated activity), the risk assessment will be recorded.

The details of an individual will be removed from the SCR once they no longer work or volunteer at the school.

34. Review

This Policy is subject to ongoing review; however, will be reviewed no later than September 2026. All staff have received a copy of this policy.

35. Key Contacts, Roles and Training

Turning Point Academy Key Contacts		
Designated Safeguarding Lead	Mike Marshall (Principal)	Designated Safeguarding Lead in Schools Training NSPCC 21st April 2021 **3rd October 2023** **8th October 2025 with NSPCC**
Deputy DSL (s)	Anthony Riley	Designated Safeguarding Lead in Schools Training NSPCC 29th March 2023 **24th October 2023** **6th November 2025 with NSPCC**
Back-Up DSL	Ryan Wray	Designated Safeguarding Lead in Schools Training NSPCC **21st June 2023** **6th November 2025 with NSPCC**
School Safeguarding Development Officer	Marc Williams	Designated Safeguarding Lead in Schools Training NSPCC **4th July 2023** **6th November 2025 with NSPCC**
Proprietor & Nominated Safeguarding Trustee	Stefan Campbell	Safeguarding training for school governors and Trustees NSPCC **24th September 2025** **September 2026**
Prevent Lead	Mike Marshall	Channel and Prevent Training Government Online Training **March 2025** **Renewal – March 2026**

Lancashire County Council Key Contacts	
LCC School Safeguarding Officers Victoria Wallace, Mechelle Lewis and Sarah Holyhead	Safeguarding Advice Line - 01772 531196
LCC MASH Education Officers Matt Chipchase & Martine Blokland	0300 123 6720 mash.education@lancashire.gov.uk;
LADO – Local Authority Designated Officers	01772 536694 LADO.admin@lancashire.gov.uk
MASH – Multi-Agency Safeguarding Hub	0300 123 6720 0300 123 6722 between 5.00pm - 8.00am
Lancashire Prevent Team	01254 585260 Prevent.team@blackburn.gov.uk;

Safer Recruitment Training

In line with KCSIE 2025 and The School Staffing (England) Regulations 2009 require governing bodies of maintained schools to ensure that at least one person on any appointment panel has undertaken safer recruitment training. As an Independent school, TPA adheres to this requirement, and will ensure all staff are re-trained at least every 2 years.

Name of Staff Member / Trustee	Date attended	Provided by Whom
Mike Marshall - Principal	7th April 2023 26th September 2025	Online training : NSPCC
Anthony Riley – Deputy Principal	12th April 2023 26th September 2025	Online training : NSPCC
Tracy Douglas – Deputy Principal	6th July 2023 26th September 2025	Online training : NSPCC
Claire Hand – Assistant Principal	6th July 2023 26th September 2025	Online training : NSPCC
Stefan Campbell – Proprietor / Trustee	21st March 2023 26th September 2025	Online training : NSPCC

APPENDIX 1: WORRIED ABOUT A CHILD FLOWCHART

WORRIED ABOUT A CHILD?

Concern, Disclosure or Suspicion

Physical, Emotional, Sexual Abuse or Neglect, Fabricated or Induced Illness, Honour-based violence, **or** you just have a sense that something isn't quite right. **Do** make a note of your concerns and liaise with the Designated Safeguarding Lead (DSL) in school as soon as possible and always before the end of that school day. Complete in-school record / notification via MYCONCERN. **Do not** do nothing, 'investigate', 'diagnose', prompt, probe or lead the child, try and sort it out yourself, breach confidentiality, worry about being 'wrong' and / or 'bothering' senior staff.

ANYONE CAN MAKE A REFERRAL

DSL Considers

- Current concern / incident / events & any relevant historical information
- Possible explanations & contemporaneous events
- The need to seek further external information /advice **Schools Advice:01772 531196/531643/01254 220989**
- Action/options(inc .discussion

The DSLs are:

Lead DSL: Mike Marshall

Deputy DSL : Anthony Riley

Backup DSL – Ryan Wray

All Progress Leads are also DSL trained.

Or

Need for Early Help / Support Identified

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

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

- Where it is clear that a child protection referral is necessary then the matter should be reported to Children's Social Care without delay **CSC:03001236720**
- Out of hours referral should be made to the CSC duty team **03001236722** and/ or notify police if a crime has been committed.
- Inform parents (as and when appropriate & in-line with any advice from CSC / Police)
- DSL records response from CSC(within 24 hrs) / seeks one where none is received / escalates where unhappy with response
- Anyone can make a referral! If this is someone other than the DSL in school then the DSL must be informed asap.

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

1. APPENDIX 2 **Blackpool Children: Early Help Assessment and Multi-agency referral found here:**

https://www.blackpoolsafeguarding.org.uk/for-professionals/keeping-children-safe-in-blackpool

https://www.blackpoolsafeguarding.org.uk/assets/uploads/Keeping%20Children%20Safe%20in%20Blackpool%20FINAL%20screen%20version.pdf

1.2. APPENDIX 3: TALKING AND LISTENING TO CHILDREN

If a child wants to confide in you, you *SHOULD*

- Be accessible and receptive;
- Listen carefully and uncritically, at the child's pace;
- Take what is said seriously;
- Reassure children that they are right to tell;
- Tell the child that you must pass this information on;
- Make sure that the child is ok;
- Make a careful record of what was said (see *pro forma in Appendices 4 & 5*).

1.3. You should NEVER

- Investigate or seek to prove or disprove possible abuse;
- Make promises about confidentiality or keeping 'secrets' to children;
- Assume that someone else will take the necessary action;
- Jump to conclusions, be dismissive or react with shock, anger, horror etc;
- Speculate or accuse anybody;
- Investigate, suggest or probe for information;
- Confront another person (adult or child) allegedly involved;
- Offer opinions about what is being said or the persons allegedly involved;
- Forget to record what you have been told;
- Fail to pass this information on to the correct person (the Designated Senior Leader).

1.4 Children with communication difficulties, or who use alternative/augmentative communication systems

- While extra care may be needed to ensure that signs of abuse and neglect are interpreted correctly, any suspicions should be reported in exactly the same manner as for other children;
- Opinion and interpretation will be crucial (be prepared to be asked about the basis for it and to possibly have its validity questioned if the matter goes to court).

1.4. Recordings should

- State who was present, time, date and place;
- Be written in ink and be signed by the recorder;
- Be passed to the DSL or backup immediately (certainly within 24 hours);
- Use the child's words wherever possible;
- Be factual/state exactly what was said;
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation.

1.5. What information do you need to obtain?

- Turning Point Academy has **no investigative role** in child protection (Police and Children's Social Care will investigate possible abuse very thoroughly and in great detail, they will gather evidence and test hypotheses – leave this to them!);
- Never prompt or probe for information, your job is to listen, record and pass on;
- Ideally, you should be clear about what is being said in terms of **who, what, where and when;**
- The question which you should be able to answer at the end of the listening process is 'might this be a child protection matter?';
- If the answer is yes, or if you're not sure, record and pass on immediately to the Designated Safeguarding Lead (DSL).

1.6. If you do need to ask questions, what is and isn't OK?

- **Never** asked closed questions i.e. ones which children can answer yes or no to e.g. Did he touch you?
- **Never** make suggestions about who, how or where someone is alleged to have touched, hit etc e.g. Top or bottom, front or back?
- If we must, use only '**minimal prompts**' such as 'go on … tell me more about that … tell me everything that you remember about that … … '
- Timescales are very important: '**When was the last time this happened?**' is an important question.

1.7. What else should we think about in relation to disclosure?

- Find a place in school which is particularly suitable for listening to children e.g. not too isolated, easily supervised, quiet etc;
- Think carefully about your own body language – how you present will dictate how comfortable a child feels in telling you about something which may be extremely frightening, difficult and personal;
- Be prepared to answer the 'what happens next' question;
- Never make face-value judgements or assumptions about individual children. For example, I 'know that [child .....] tells lies';
- Think about how you might react if a child DID approach you in school. Be prepared to offer a child in this position exactly what they need in terms of protection, reassurance, calmness and objectivity;
- Think about what support **you** could access if faced with this kind of situation in school.

Appendix 4:

SAFEGUARDING ALERTER FORM

-RECORD OF CONCERN-

For use by any staff – must be handwritten and legible

Body Maps are also available if needed – please attach if appropriate

Pupil's Name		**Date of birth**		**Class/Form**	
Date & time of incident				**Date & time (of writing)**	

Your Name	
Your job title	
Signature	

Record the following factually – • *Nature of concern eg disclosure, change in behaviour, demeanour, appearance, injury, witness etc (please include as much detail in this section as possible.* • *Remember – the quality of your information will inform the level of intervention initiated. Attached additional sheets if necessary.*	

What is the pupil's perspective?	
Professional opinion, where relevant *(how and why might this have happened?)*	
Any other relevant information - *Previous concerns etc (distinguish between fact and opinion)*	

Note actions, including names of anyone to whom your information was passed and when.	

Check to make sure your record is clear to someone else reading it.

Please pass this form to one of the Designated Safeguarding Leads WITHOUT DELAY

1. *Mike Marshall (Principal)*
2. *Anthony Riley (Assistant Principal)*
3. *Ryan Wray (School Guidance Counsellor)*

- *FOR USE BY DESIGNATED SAFEGUARDING LEAD-*

DSL Name					
Information received by DSL					
Date		*Time completed*		*From whom*	
Any advice sought, if applicable					
Date		*Time completed*		*From* *Name / organisation*	
Advice received					

Action taken with reasons recorded *(e.g. MARF completed, monitoring advice given to appropriate staff)*					
Date		*Time completed*		*By whom*	
Outcome(s)					
Date		*Time completed*		*By whom*	
Details of outcome					
Parent(s) / carer(s) informed?					
YES		*Who spoken to*		*Date / Time* *By Whom*	
NO		*Detail reason(s)*			
Is any additional detail held and if so, where?					
Safeguarding History					
No Previous records of concern		*Early Help Assessment?*		*On Child Protection Plan / Child in Need Plan?*	
Previously on CP or CiN Plan?		*Child known to other agencies, if so, which?*			

Name of DSL		*Signature of DSL*	

Appendix 5

Local Authority Designated Officer (LADO)

Blackburn with Darwen	Blackpool	Lancashire
01254 585 184	01253 477558	01772 536 694
LADO@blackburn.gov.uk	lado@blackpool.gov.uk	LADO.Admin@lancashire.gov.uk

As outlined in "Working Together to Safeguard Children" (2018), the LADO will be informed of allallegations against adults working with children and provides advice and guidance to Senior Managers on the progress of cases to ensure they are resolved as quickly as possible. Information relating to allegations is collated and presented to Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership (CSAP) to inform training, research, safer recruitment and awareness raising.

The LADO is located within Children's Services and should be alerted to all cases in which it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed a child
- Possibly committed a criminal offence against, or related to, a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

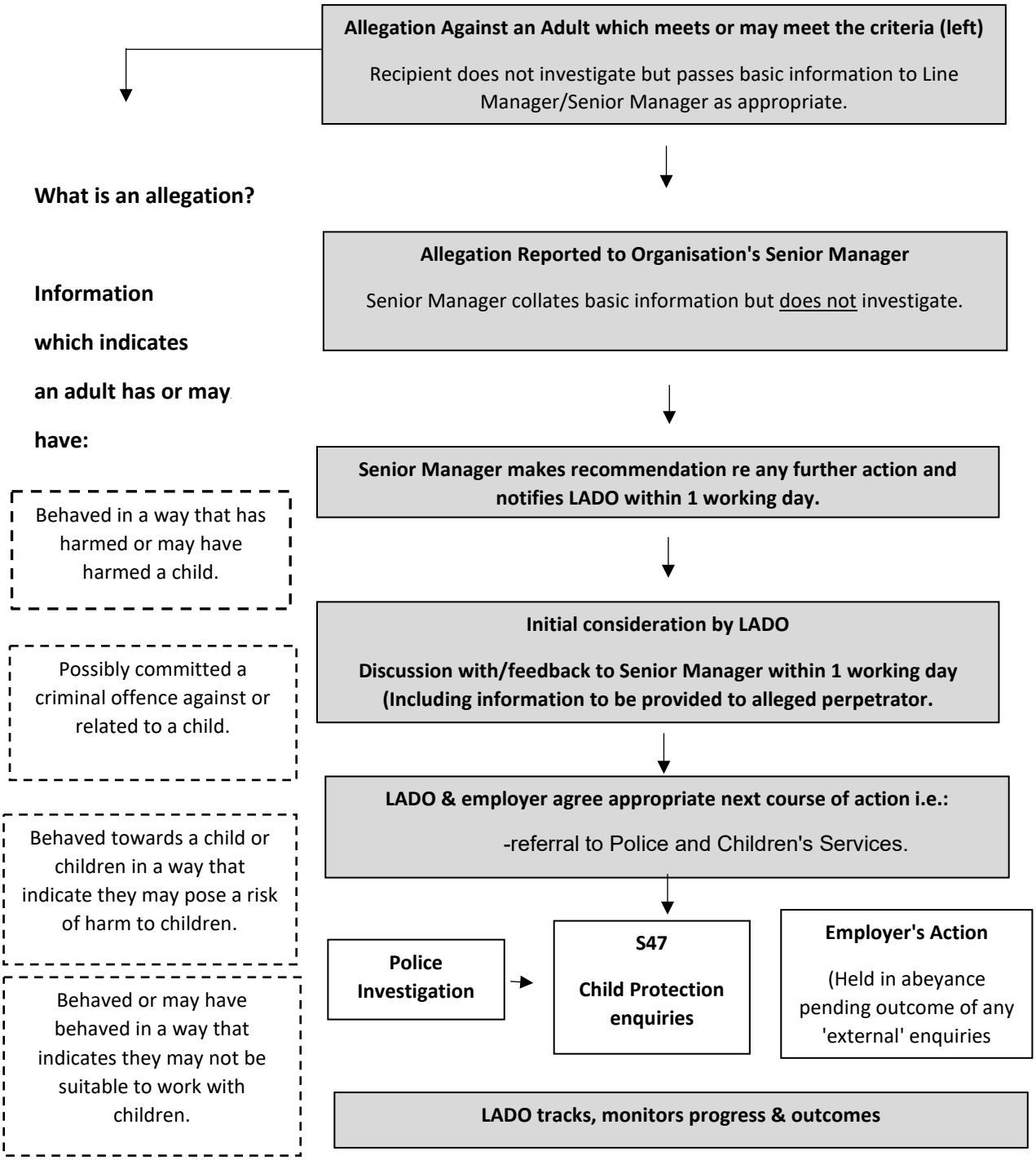
The LADO role applies to the children's workforce (paid, self-employed and volunteers). The LADO is involved from the initial phase of the allegation through to the conclusion of the case.

The LADO will provide advice and guidance and help determine that the allegation sits within the scope of the procedures. Within the role the LADO helps co-ordinate information sharing. The LADO will also monitor and track any investigation with the expectation that it is resolved as quickly as possible.

These procedures may also be used where concerns arise about:

- The person's behaviour with regard to his/her own children
- The behaviour in the private or community life of a partner, member of the family or other household member
- A person's behaviour in their personal life, which may impact upon the safety of children to whom they owe a duty of care.

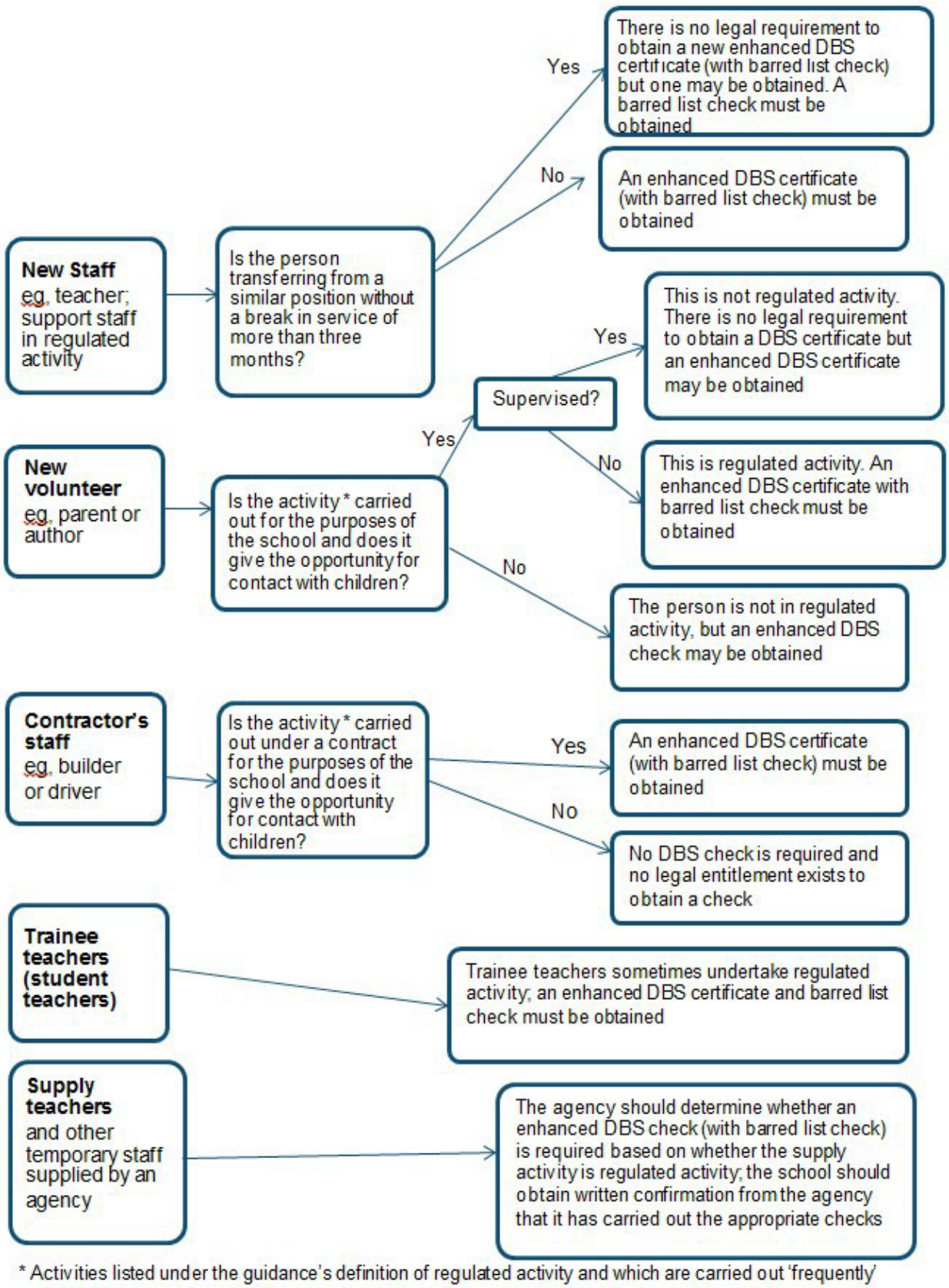
Flowchart: Procedure for Managing Allegations



Remember: The LADO must be contacted when you have received any allegation or concern about any person who works with children who may have. -

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Appendix 6: Safer Recruitment DBS Flowchart



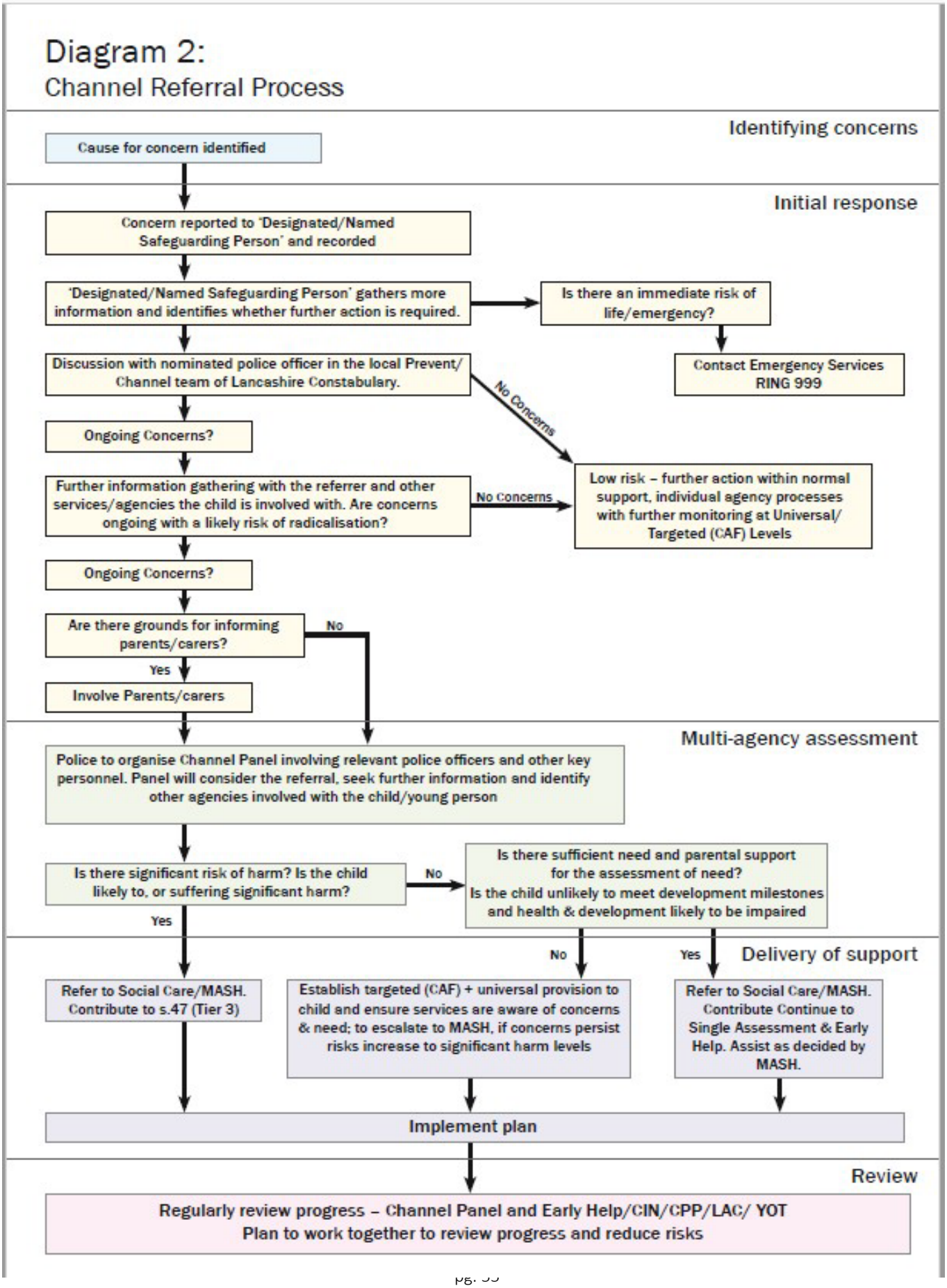
* Activities listed under the guidance's definition of regulated activity and which are carried out 'frequently'

APPENDIX 7 - Safeguarding Calendar (2-year cycle)

(2-year cycle ensure training needs are covered)

September 2025	October 2025	November 2025
• Annual Safeguarding Refresher for all staff – inc. policies, procedures, site security, code of conduct, mobile phone use etc. • Update Safeguarding Policy and upload to website. • Ensure staff read KCSiE Part 1/Annexe A and B and record. Use knowledge check / quiz to check understanding. • Check that there are 3 emergency contact numbers for each child. • Check transfer of records complete for transitioning pupils – record evidence. • Meet with teaching staff to promote educational outcomes for children with a social worker. Have we shared relevant information with staff who need to know? • Have all Trustees received safeguarding training?	• Plan and deliver parental mental health and substance misuse training. • World mental health day • Have external providers signed up to and able to implement our safeguarding policy? • Due diligence forms for providers. • Review of attendance – any emerging patterns of concern?	• Annual Safeguarding audit • Plan and deliver domestic abuse training. • Anti-bullying week • Single Central Register check • Review / refresh public information around school. • Review school website in relation to safeguarding information for staff, parents, public and children.
December 2025	**January 2026**	**February 2026**
• Plan and deliver children living away from home training. • Human rights day (10th Dec) • Review safeguarding provision for anyone on alternative timetables. • Consider Christmas holiday support plans for vulnerable children.	• Plan and deliver young carers training. • Meet with teaching staff to promote educational outcomes for children with a social worker. • Review impact of safeguarding curriculum including online safety. • Site security audit	• Plan and deliver child substance abuse and child mental health training. • Children's Mental Health Week. • Stand up to Bullying Day • Self-audit of safeguarding practice involving Trustees. • Attendance review – how are concerns being managed? What support is in place?
March 2026	**April 2026**	**May 2026**
• Plan and deliver child exploitation training, this will include county lines, criminal and sexual exploitation. • Young Carer's Day • International Women's Day • Single Central Register check with Trustees	• Plan and deliver sexual violence and sexual harassment training – this will include consensual and non-consensual sharing of images. • Consider appropriate support for children with exams approaching. • Meet with teaching staff to promote educational	• Plan and deliver missing children training – this will include children missing from education, missing from home/care and persistent absence. • Review / publish information around school. • Compile annual safeguarding report.

• Consider Easter holiday support for vulnerable children. • Plan ahead – think about transition for vulnerable children who might need additional support.	outcomes for children with a social worker. • Complete pupil survey, including focus on feeling safe in school environment.	• Review recruitment materials and ensure have sufficient staff with safer recruitment training.
June 2026	**July 2026**	**September 2026**
• Plan and deliver children in the court system / family members in prison and child abduction training. • Pride month – celebrate LGBTQ+. • Review attendance – what impact have interventions had? What are the next steps to ensure pupils are safe and supported?	• Plan and deliver bullying training – this includes hate crimes, discriminatory bullying, prejudice based bullying and cyber bullying. • Ensure appropriate transition plans are in place for pupils exiting school. • Single Central Register check with Trustees • Consider summer holiday support plans for vulnerable children. • Share information with parents / pupils about local support services. • Staff training check – how much have staff understood about their training?	• Annual Safeguarding Refresher for all staff – inc. policies, procedures, site security, code of conduct, mobile phone use etc. • Update Safeguarding Policy and upload to website. • Ensure staff read KCSiE Part 1/Annexe A and B and record. Use knowledge check / quiz to check understanding. • Check that there are 3 emergency contact numbers for each child. • Check transfer of records complete for transitioning pupils – record evidence. • Meet with teaching staff to promote educational outcomes for children with a social worker. Have we shared relevant information with staff who need to know? • Have all Trustees received safeguarding training?
October 2026	**November 2026**	**December 2026**
• Plan and deliver poverty and homelessness training. • World mental health day • International Day of the Eradication of Poverty • Anti-Slavery day • Have external providers signed up to and able to implement our safeguarding policy? • Due diligence forms for providers. • Review of attendance – any emerging patterns of concern?	• Plan and deliver child on child abuse training • World Children's Day • Anti-bullying week • Single Central Register check • Review / refresh public information around school. • Review school website in relation to safeguarding information for staff, parents, public and children.	• Plan and deliver neglect training • Review safeguarding provision for anyone on alternative timetables. • Consider Christmas holiday support plans for vulnerable children.

January 2027	February 2027	March 2027
• Plan and deliver radicalisation training. • Review impact of safeguarding on the curriculum – consult with all stakeholders • Brew Monday - Samaritans • Meet with teaching staff to promote educational outcomes for children with a social worker. • Review impact of safeguarding curriculum including online safety. • Site security audit.	• Plan and deliver online safety training and cybercrime training. • Safer Internet day • Self-audit of safeguarding practice involving Trustees. • Attendance review – how are concerns being managed? What support is in place?	• Plan and deliver sexual abuse training • Stop CSE day • Young Carer's Day • International Women's Day • Single Central Register check with Trustees • Consider Easter holiday support for vulnerable children. • Plan ahead – think about transition for vulnerable children who might need additional support.
April 2027	**May 2027**	**June 2027**
• Plan and deliver physical and emotional abuse training (inc. fabricated and induced illness). • Consider appropriate support for children with exams approaching. • Meet with teaching staff to promote educational outcomes for children with a social worker. • Complete pupil survey, including focus on feeling safe in school environment. •	• Plan and deliver gangs and youth violence training • Review / publish information around school. • Compile annual safeguarding report. • Review recruitment materials and ensure have sufficient staff with safer recruitment training.	• Plan and deliver trafficking and modern slavery training • Learning disabilities week • Pride month – celebrate LGBTQ+. • Review attendance – what impact have interventions had? What are the next steps to ensure pupils are safe and supported?
July 2027		
• Plan and deliver harmful practices training (FGM / HBV / Forced Marriage) • Ensure appropriate transition plans are in place for pupils exiting school. • Single Central Register check with Trustees • Consider summer holiday support plans for vulnerable children. • Share information with parents / pupils about local support services. • Staff training check – how much have staff understood about their training?		

APPENDIX 8: Prevent/Channel Referral Process