



EMMAUS
CATHOLIC ACADEMY TRUST

DIOCESE OF  **SALFORD**

EMMAUS CATHOLIC ACADEMY TRUST

Safeguarding and Child Protection Policy

September 2026

POLICY DOCUMENT	Safeguarding and Child Protection Policy
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EMMAUS CATHOLIC ACADEMY TRUST

The Diocese of Salford provides Catholic Academy Trusts, schools, and colleges for the following reasons:

- 1. To assist in the mission of making Christ known to all people;**
- 2. To assist parents and carers, who are the prime educators of their children, in the education and religious formation of their children;**
- 3. To be of service to the local Church – the Diocese – the Parish and the Christian home;**
- 4. To be of service to society.**

Emmaus Catholic Academy Trust Vision:

To provide great Catholic education across Greater Manchester.

Journey with Emmaus CAT...

DIOCESE OF  **SALFORD**

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1. Policy Statement

Our core purpose is to create a healthy Catholic community serving the pupils in our Catholic schools, communities, families, and parishes across Greater Manchester. We are aligned in our mission to work collegially to ensure that we have great schools, strong in faith, serving society. Schools where every pupil has an equal opportunity to thrive and receive the very best Catholic education and formation. Our guiding principles and this Safeguarding and Child Protection Policy exist to ensure that each Emmaus CAT school has a clear and compelling vision for all of its pupils, focused on creating an inclusive environment, tailored to the needs and abilities of each and every pupil. At Emmaus CAT we will succeed with our philosophy of aligned agency, the belief that talent is key and the sharing of curriculum knowledge and academic rigor.

2. Aim of Emmaus CAT Policies

The aim of this, and all Emmaus CAT policies is to support the seven major themes of Catholic Social Teaching, which include;

- The dignity of work and the rights of the worker;
- Solidarity with all people;
- A preferential option for the poor;
- Stewardship and care for creation;
- The call to community and participation;
- The sacredness of life and the dignity of the human person;
- Human rights and the responsibility to protect them;

as well as ensuring that national legislation and guidance are implemented across all our schools. Our policies should not be viewed in isolation, but along with our guiding principles, as integral to all aspects of school improvement. With our policies we aim to create an effective partnership with parents and carers, the prime educators of their children, to ensure that all children reach their potential whilst setting high expectations and aspirations, in a positive and supportive environment. All Emmaus CAT policies will clearly define and communicate the core principles which underpin our Catholic culture, mission and vision.

3. Good Safeguarding Practice

The following key features will help schools promote and maintain a safer culture that protects and promotes the welfare of children, young people and vulnerable adults. These features are:

- A leadership commitment, at all levels, to the importance of safeguarding and promoting the welfare of children, young people and vulnerable adults.
- A clear line of accountability for all safeguarding work with clarity of roles and responsibilities.
- Clear reporting procedures to deal with safeguarding concerns and allegations.
- Practice and services informed by ongoing learning, review, and by the active involvement

- of student voice and parent participation.
- Safer recruitment procedures in place.
- Clear arrangements for support and professional supervision.
- Comprehensive safeguarding training for all staff and volunteers working with or in contact with children, young people and their families.
- Effective working with statutory and voluntary sector partners
- Complaints and whistleblowing procedures that are well publicised.
- Effective information sharing.
- Good record keeping.
- Regular training and/or updates.
- Induction of new staff.

4. Policy Commitments

Emmaus CAT commits to:

Promoting a safer environment and culture

All staff and volunteers respect our children and promote their well-being. We will strive to create and maintain environments that are safer for all, that promote well-being, that prevent abuse, and that create nurturing, caring conditions within our schools for all. We will work to continue to strengthen and review these environments. This will be done by training, support, communication, learning, governance and quality assurance processes. Emmaus CAT will strive to support all school leaders to adhere to safer working good practice and to challenge the abuse of power. It will ensure that processes are in place that listen to and advocate on behalf of children and their families within the knowledge that they will be cared for safely.

Safely recruiting and supporting all those with any responsibility related to children within our schools.

The CAT, school leaders and governing bodies will select and vet all those with any responsibility related to children, young people and vulnerable adults, in accordance with the safeguarding policy and practice guidance. We will train and equip all staff and volunteers to have the confidence and skills they need to care and support children and their families and to recognise and respond to abuse. This will be done by supporting the roll-out of consistent and accessible safeguarding training in accordance with early KCSiE requirements.

Responding promptly to every safeguarding concern or allegation.

Anyone who brings any safeguarding suspicion, concern, knowledge or allegation of current or non-current abuse to our notice will be responded to respectfully and in a timely manner, in line with statutory child and adult safeguarding procedures and Emmaus CAT policies. All safeguarding work will be recorded in line with KCSiE requirements. All suspicions, concerns, knowledge or allegations that reach the threshold for reporting to the statutory authorities, will be reported via the DSL to the appropriate statutory agency. This will be done irrespective of the

status of the person. All staff and volunteers will cooperate with the statutory authorities in all cases. In responding to concerns or allegations of abuse relating to any adult within our schools, we will act in accordance with the requirements of criminal, civil and ecclesiastical law, and so will respect the rights and uphold the safeguards afforded in these, both to the person alleging harm and the subject of concerns or allegations

Caring pastorally for victims/survivors of abuse and other affected persons

Emmaus CAT will endeavour to offer care and support resources to all those that have been abused, regardless of the type of abuse, when or where it occurred. We are committed to continuing to learn how to respond in a supportive and healing way to the needs of those who have suffered abuse. Those who have experienced harm will receive a compassionate response, be listened to and be taken seriously. Emmaus CAT leaders will respond to any disclosure of abuse in accordance with statutory legislation and Emmaus CAT policy and practice guidance. This will be done in collaboration with the relevant statutory agencies in accordance with criminal, civil and ecclesiastical law. They will be offered appropriate pastoral care, counselling and support – according to the agreed need. An appropriate pastoral response will be considered, with due regard to the right of privacy of those directly involved, and to the administration of justice.

Caring pastorally for those who are the subject of concerns or allegations of abuse and other affected persons

Emmaus CAT leaders, in exercising their responsibilities to suspicions, concerns, knowledge or allegations of abuse will endeavour to respect the rights under criminal and civil law. A legal presumption of innocence will be maintained during the processes. As the process progresses additional assessment, therapy and support services may be offered in consultation with relevant external agencies. Emmaus CAT leaders will take responsibility for ensuring that steps are taken to protect others when any adult is considered a risk to children. Emmaus CAT will remain alert to the need to provide wider support to those affected.

5. Acronyms

Acronym	Long Form	Description
CCE	Child Criminal exploitation	Where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised

		network or gang, and the victim may identify as being part of this group.
CME	Child Missing from Education (Children who are Absent from Education)	CME are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. CME includes children who: • are in the process of applying for a school place • have been offered a school place for a future date but have not yet started • are receiving elective home education (EHE) that has been assessed as unsuitable • have been recorded as CME for an extended period, for example where their whereabouts is unclear or unknown CME are not children who: • are receiving suitable education otherwise than at a school (for example, pupils who are electively home educated or attending alternative provision) which is suitable to the child's age, ability, aptitude and any special educational needs they may have • are EHE but the local authority has not had an opportunity to assess whether the education being provided is suitable • are registered at a school, even if they are persistently or severely absent from that school.
CPOMS	Child Protection Online Management System (CPOMS)	CPOMS is a secure, cloud-based software platform widely used by all Emmaus CAT schools to record, share and track pupil incidents and information relating to child protection, safeguarding, and pastoral/welfare issues. Refer to Emmaus CAT CPOMS Policy and User Guide for further information.

CSC	Children's Social Care	The Local Authority department responsible for protecting vulnerable children and providing statutory support to children and families in need, as per the responsibilities outlined in <u>Children's social care national framework - GOV.UK</u>
CSE	Child Sexual Exploitation (CSE)	Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any sexual activity in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.
DBS	Disclosure and Barring Service	DBS (Disclosure and Barring Service) is a public body that helps employers make safer recruitment decisions by processing criminal record checks and maintaining the statutory Barred Lists.
DfE	Department for Education	The Department for Education is the ministerial (Government) department responsible for children's services and education, including early years, schools, higher and further education policy in England.
DPO	Data Protection Officer	The appointed person in a school or trust with the responsibility for overseeing the responsible use of data within the organisation and ensure data is handled in line with the Data Protection Act
DSL	Designated Safeguarding Lead	The Designated Safeguarding Lead (DSL) is a senior member of staff who holds overall strategic responsibility for safeguarding and child protection within the school or trust, ensuring effective leadership, implementation, and quality assurance of safeguarding practice, policies, and procedures.

DDSL	Deputy Designated Safeguarding Lead	The designated safeguarding lead deputy who is trained to the same standard as the DSL, and supports the primary DSL in ensuring that safeguarding and child protection responsibilities are managed effectively across a school or college.
EHCP	Educational Health and Care Plan	An Education, Health and Care Plan (EHCP) is a legally binding document in the UK that describes a child or young person's special educational needs, the support they require, and the goals they want to achieve, bringing together assistance from education, health, and social care.
EHA	Early Help Assessment (Family Help)	An Early Help Assessment is a tool that helps to identify and address the needs of children and their families. It involves a lead practitioner who works with the child and their parent or carer, with their consent to gather and analyse information about their situation. The assessment leads to a family plan that outlines the goals and actions to improve the outcomes for the child and family.
FGM	Female Genital Mutilation	A procedure where the female genital organs are injured or changed. There is no medical reason for doing this.
UK GDPR	UK General Data Protection Regulations	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent
HBA	Honour or Faith-based abuse	Honour or faith-based abuse or violence encompasses incidents or crimes that have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing.
HMCTS	HM Courts and Tribunal Service	HMCTS is responsible for the administration of criminal, civil and family courts and tribunals in

		England and Wales. HMCTS is an executive, sponsored by the Ministry of Justice.
KCSiE	Keeping Children Safe in Education	Statutory guidance setting out schools and colleges' responsibilities to safeguard and promote the welfare of children. Any policy update will be duly amended and referenced. This policy makes reference to the most recent version of KCSiE
LA	Local Authority	A local authority is an administrative body responsible for delivering public services, governing local areas, and planning in a specific part of the UK. Public services include education and schools, social care, housing and planning, environment, and infrastructure.
CLA/LAC	Children in the care of the local authority/Looked After Children.	A Looked After Child (LAC) is a legal term in the UK for any child or young person under 18 who is in the care of their local authority (council) for more than 24 hours. They are frequently referred to as children "in care" or "care experienced".
LADO	Local Authority Designated Officer	A LADO is the designated person employed by the LA to respond to allegations of abuse against adults who work with children. Every LA must have a LADO in place who is responsible for co-ordinating the response to the allegation. The LADO works with the employer, the police, and other agencies to ensure a fair and thorough investigation.
LGBTQ+	Lesbian Gay Bisexual Transgender and Queer	Term relating to a community of people who share protected characteristics covered by the Equalities Act
MAT	Multi-Academy Trust	An educational trust set up to provide support and collaboration across a number of schools
PLAC	Previously Looked After Children	Children who have been in the care of the Local Authority but ceased to be because they were adopted (or became subject to a child's

		arrangements order or a special guardianship order)
PSHE	Personal, Social and Health Education	A non-statutory subject which forms part of the personal development curriculum and allows pupils to learn about themselves, other people, rights, responsibilities and relationships
PHE	Public Health England	An executive agency of the Department of Health and Social care which aims to protect and improve the nation's health and wellbeing
RSHE	Relationship, Sex and Health Education	A statutory component of the curriculum covering primary and secondary education sectors, that teaches pupils about different relationships, consent, the promotion of healthy relationships and sexual health which is age appropriate
SCR	Single Central Record	A statutory secure record of all employees, volunteers and regular visitors to the school which documents evidence that checks have been completed to ascertain their suitability to work with children. For employees this should evidence records of pre-employment checks
SENCo	Special Educational Need Co-ordinator	A statutory role within schools maintaining oversight and coordinating the school's special educational needs policy and provision to support pupils with special educational needs
SEND	Special Educational Needs and Disabilities	A term to describe pupils who have specific needs which may be a barrier to their learning. Pupils who are identified as SEND should have clear recommendations for school staff which allow them to access their learning
SLT	Senior Leadership Team	Senior members of school staff responsible for strategic decision making with responsibilities for specific areas within the school
TRA	Teacher Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching professions
VSH	Virtual School Head	The named person within the Local Authority with responsibility for promoting the education and

		welfare of looked after children, previously looked after children and children with a social worker
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6. Definitions

The terms “children and child” refer to anyone under the age of 18.

Safeguarding and promoting the welfare of children is defined as:

- Providing early help and support as soon as problems emerge
- Working in partnership with families and other agencies
- Taking a child-centred approach, ensuring the child’s needs, voice, and lived experience are central
- Shared responsibility across all professionals and organisations working with children
- Protecting pupils from maltreatment, whether that is within or outside the home, including online.
- Preventing the impairment of children’s mental and physical health and 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.

Safeguarding is **broader than child protection**

- *Child protection* = responding to children at risk of significant harm
- *Safeguarding* = prevention, early help, and ongoing support

Consent is the informed, voluntary agreement by a person with the capacity and understanding to make a decision, given without coercion, to allow an action or the sharing of information.

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. However, the age of consent for sharing nude or semi-nude images is 18.

Sexual violence refers to the following offences as defined under the Sexual Offences Act 2003

Rape: A person commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person with their penis, without consent.

Assault by penetration: A person commits an offence if they intentionally penetrate the vagina or anus of another person with a part of their body or anything else, the penetration is sexual and non-consensual.

Sexual assault: A person commits an offence of sexual assault if they intentionally touch another person, the touching is sexual, and non-consensual.

Causing someone to engage in sexual activity without consent: A person commits an offence if they intentionally cause another person to engage in an activity, the activity is sexual and non-consensual. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

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.
- Up-skirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.
- Sexual exploitation, coercion, and threats.

Up-skirting refers to the act, as identified in 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. Up-skirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of up-skirting.

Consensual and Non-Consensual Sharing of Nude or Semi-Nude Images

The consensual and non-consensual sharing of nude or semi-nude images and/or videos—commonly referred to as "sharing nudes and semi-nudes"—is defined as the exchange between pupils of sexually explicit material, including indecent imagery.

For the purposes of this policy, "**indecent imagery**" refers to any image that depicts or suggests one or more of the following:

- A child who is nude or partially nude in a sexualised manner
- A child engaging in or appearing to engage in sexual activity
- A child being subjected to sexual harm or exploitation

- Sexual activity involving a child and an adult
- Sexual activity involving animals

This policy recognises that AI-generated or digitally manipulated sexual images of children constitute indecent imagery under UK law. The creation, possession, or sharing of such material is treated as a safeguarding and criminal matter in line with DfE and UKCIS guidance.

7. Legal Framework/Statutory/Non-Statutory Guidance and Other Relevant Policies

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

Legislation

- [Children Act 1989 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Children Act 2004 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Safeguarding Vulnerable Groups Act 2006 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [The Education \(School Teachers' Appraisal\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Sexual Offences Act 2003 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Female Genital Mutilation Act 2003 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Serious Crime Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Apprenticeships, Skills, Children and Learning Act 2009 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Equality Act 2010 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Counter-Terrorism and Security Act 2015 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [UK General Data Protection Regulation | ICO](https://ico.org.uk)
- [Data protection: The Data Protection Act - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Voyeurism \(Offences\) Act 2019 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Domestic Abuse Act 2021 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Marriage and Civil Partnership \(Minimum Age\) Act 2022 \(legislation.gov.uk\)](https://legislation.gov.uk)
- [Online Safety Act - GV.UK](https://gov.uk)
- [Martyn's Law: the SIA's new regulatory role - GOV.UK](https://gov.uk)
- [Children's Wellbeing and Schools Act 2026](https://legislation.gov.uk)

Statutory guidance

- [Multi-agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage \(accessible version\) - GOV.UK](https://gov.uk)
- [Multi-agency statutory guidance on female genital mutilation - GOV.UK \(www.gov.uk\)](https://gov.uk)
- [Channel and Prevent Multi-Agency Panel \(PMAP\) guidance - GOV.UK \(www.gov.uk\)](https://gov.uk)

- [Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- [Keeping children safe in education – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Working together to safeguard children – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Prevent duty guidance – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Disqualification under the Childcare Act 2006 – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Alternative provision – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Supporting pupils with medical conditions at school – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Working together to improve school attendance – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement](https://www.gov.uk)
- [Children missing education: statutory guidance for local authorities and schools – GOV.UK](https://www.gov.uk)

Non-statutory guidance

- [Child abuse concerns: guide for practitioners – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Information sharing advice for safeguarding practitioners – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Child sexual exploitation: definition and guide for practitioners – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Child exploitation disruption toolkit – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Recruit teachers from overseas – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Virginity testing and hymenoplasty: multi-agency guidance – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Meeting digital and technology standards in schools and colleges – Filtering and monitoring standards for schools and colleges – Guidance – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Keeping children safe in out-of-school settings – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Promoting and supporting mental health and wellbeing in schools and colleges – GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- [Mental health and behaviour in schools \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- [Support for pupils where a mental health issue is affecting attendance: effective practice examples \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- [Right to work checks: an employer's guide – GOV.UK](https://www.gov.uk)
- [Mobile phones in schools – GOV.UK](https://www.gov.uk)
- [Use of reasonable force and other restrictive interventions guidance](https://www.gov.uk)

This policy operates in conjunction with the following school policies as applicable:

- Children Missing Education Policy (Children who are Absent from Education)
- Child-on-child Abuse Policy/Anti-Bullying Policy
- Behaviour/Exclusion Policy
- Online Safety Policy (including filtering and monitoring/Acceptable User Agreement)

- Staff Behaviour/Code of Conduct policy

8. Roles and responsibilities

DSL

The DSL is a member of the school's senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding. Please refer to Annex B of KCSiE a full description of the DSL's responsibilities. In the absence of the DSL, the Deputy DSL will provide appropriate cover. All deputies must be suitably trained to the same standard as the designated safeguarding lead and

the role is explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility is not delegated.

Please see appendix 5 for the current details of all Emmaus CAT DSLs.

The DSL or DDSL will be available during school hours for staff to discuss any safeguarding concerns.

KCSiE states that schools should implement robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances. This could include a confidential shared mailbox or equivalent system to ensure that safeguarding concerns are received, monitored, and acted upon without delay.

Out of term cover is contractual in some settings and additionally email advice can be sought from the Emmaus CAT Central team.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police).
- Support staff who make such referrals directly.
- Lead on online safety with oversight of filtering and monitoring systems
- Liaise with teaching and pastoral staff, the SENCO, mental health leads, IT staff and other professionals
- Ensure the child protection file is shared securely, separately from the main file, and within 5 days (or within the first 5 days of a new term), with receipt confirmed.
- Ensure there are effective reporting and recording systems
- Respond to safeguarding context and identified needs
- Lead an effective safeguarding culture

- Manage the safeguarding training process for staff, ensuring that all school staff, volunteers and Governors receive regular and appropriate safeguarding training.
- Engage with parents in respect of safeguarding matters and family help

Where the DSL is not the Headteacher, the DSL within each school setting will keep the Headteacher informed of any issues and liaise with other agencies as appropriate.

The full responsibility of the DSL is set out in their job description (and KCSIE). The Emmaus CAT Central team will work closely with all school DSLs who hold responsibility for safeguarding and line managing the DDSLs in their respective schools.

DSL support

The Emmaus CAT Central Safeguarding Team are available to provide complex case management support and general safeguarding advice and guidance to all DSLs.

Safeguarding and Governors

The Local Governing Board and proprietors are responsible for ensuring that their school or college meets its statutory safeguarding duties and promotes the welfare of children by creating a strong safeguarding culture. They must ensure that appropriate policies and procedures are in place, including appointing a suitably qualified Designated Safeguarding Lead (DSL) from the leadership team, and that safeguarding arrangements are effective, regularly reviewed and compliant with statutory guidance. They should ensure that staff receive appropriate safeguarding training, that safer recruitment practices are followed, and that there are clear systems for managing concerns, allegations and information sharing. The Local Governing Board must also ensure that safeguarding is integrated into all aspects of school life, that children are taught about safeguarding (including online safety), and that the school works effectively with safeguarding partners, recognising that safeguarding is a shared responsibility across agencies.

Emmaus CAT Schools will identify a lead governor to take leadership responsibility for safeguarding arrangements. In practice, this is often the link or safeguarding governor, who supports the governing body in having strategic oversight of safeguarding. Their role is to monitor and challenge the effectiveness of safeguarding policies, procedures and practice, ensuring they are compliant with KCSIE and working effectively in the setting, rather than becoming involved in individual cases.

The safeguarding governor will work closely with the DSL and headteacher, acting as a link between them and the governing body, and providing assurance that safeguarding systems, training, safer recruitment, and record-keeping are robust. They should ensure safeguarding remains a standing priority at board level, that all governors receive appropriate training, and that the school maintains a strong safeguarding culture with effective multi-agency working.

Their focus is on strategic leadership, oversight, and accountability, rather than operational safeguarding decisions.

The role of the Headteacher

The Headteacher has overall responsibility for all safeguarding concerns involving the school (including historic). Key responsibilities of the Headteacher include the following duties:

- The Headteacher is responsible for appointing the DSL.
- The Headteacher is responsible for overseeing the communication with the LADO relating to any allegation about a member of staff or volunteer (including supply teachers and third-party agency staff) in accordance with LA and school procedures.
- The Headteacher will act as a 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- The Headteacher is responsible for liaising with the LADO and other relevant safeguarding partners with regard to any historic safeguarding concerns.
- The Headteacher will ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- The Headteacher (via the DSL) is responsible for ensuring that all staff and volunteers have received appropriate safeguarding training, and that this training is up to date and a record is kept.
- The Headteacher, together with the DSL, is responsible for appropriately supporting, in line with legislation, all children and staff when abuse occurs or allegations of abuse are made.
- The Headteacher should work closely with the DSL to ensure a diligent culture where '*Safeguarding is Everyone's Responsibility*'. All stakeholders are confident in reporting concerns, and staff adopt a vigilant approach of '*It could happen here*'.

Designated teacher

The designated teacher has a responsibility for promoting the educational achievement of CLA and previously CLA/(PLAC), any child with a social worker, any child in kinship care, 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. More information regarding the role of the Designated Teacher can be found in the local authority Looked After Children Policy. They will work with the DSL, staff, carers, local authorities and the Virtual School Head to ensure that children receive appropriate support, including the effective use of Personal Education Plans (PEPs) and Pupil Premium Plus funding.

All staff

Safeguarding is a fundamental part of each person's role within school. Staff will promptly report safeguarding concerns, in line with school procedures and ensure policies and guidance are followed as directed by the DSL.

Staff will:

- Ensure they listen to the pupil and report concerns accurately, always following the school safeguarding procedures.
- Actively participate in regular safeguarding training and safeguarding updates.
- Read and understand all policies and procedures relating to safeguarding and seek clarification as required.
- Report concerns about members of staff in line with school procedures ([see appendix 3](#)).
- Work within a culture of vigilance and adopt a mindset of “it could happen here.”

9. Multi-Agency Working

Emmaus Catholic Academy Trust (CAT) and schools recognise that safeguarding and promoting the welfare of children is a shared responsibility and is committed to effective multi-agency working in line with its statutory duties. Each school will follow the local safeguarding arrangements of the relevant Local Authority, as set out in Appendix 5. DSLs will be fully engaged with, and contribute to, local safeguarding partner arrangements, working in-line with local safeguarding procedures.

School staff will work closely with children’s social care, the police, health services and other partners to protect the welfare of pupils. This includes active participation in early help processes and contributing to multi-agency assessments, plans and interventions to provide timely and appropriate support. DSL will take a lead role in liaising with external professionals, ensuring that children’s needs are understood holistically and that appropriate referrals are made where necessary.

Information sharing

Emmaus CAT recognises the importance of proactive information sharing between professionals and local agencies 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 over-ride 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.

Schools will have a confidential shared mail-box as a requirement for robust cover arrangements for DSLs. This should be used for sharing safeguarding information such as Encompass Notifications and CSC teams.

10. Early help (Family Help)

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. All school and college staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help/family help process will be followed as required.

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 and consideration given to a referral to CSC for assessment for statutory services if the pupil's situation is not improving or is worsening.

11. Categories of abuse

How do I know a child or young person is being abused?

Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in a school setting by those known to them or by others (e.g. via the internet). They may be abused by

an adult or adults, or another child or children. The term '*child*' is used to include all children and young people who have not yet reached their 18th birthday.

Child abuse is categorised as:

Physical abuse

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

Sexual abuse

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

Emotional 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.

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

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs and is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse, maternal mental ill health, learning difficulties or a cluster of such issues. Where there is domestic abuse and violence

towards a carer, the needs of the child may be neglected. Once a child is born, neglect may involve a parent failing to:

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

It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs. Other types of neglect include:

Educational Neglect – whereby a parent/carers fails to ensure their child's educational needs are being met.

Affluent Neglect – is a form of child neglect experienced in wealthy families where a child's physical needs may be met, but their emotional and psychological needs are unfulfilled.

12. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff should be made aware of these issues and these should form the basis of regular refresher training.

Appendix 2 of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues. **It is vital that staff are signposted and read this section**

13. Child-on-child abuse (including harassment and violence)

KCSiE defines child-on-child abuse as abuse between children. The school has a zero-tolerance approach to abuse, including child-on-child abuse. 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. In fact, schools must assume it is happening and ensure pupils are aware of how to report incidents of child-on-child abuse.

All staff will speak to the DSL if they have any concerns about child-on-child abuse. All staff will understand the importance of challenging inappropriate behaviour between pupils and will not tolerate abuse as “banter” or “part of growing up”. Child-on-child abuse can be manifested in many ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.

- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse or by-standing.
- 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.
- Up-skirting.
- 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.
- By-standing – although not taking part in the bullying, may show the perpetrator that they support them by being there.
- Exclusion – where someone is deliberately excluded or ostracised from a group.
- Racially motivated name calling.
- Misogyny and voluntary in celibacy (INCEL)

All staff will understand the importance of challenging inappropriate behaviour between pupils and will not tolerate abuse as “banter” or “part of growing up”.

All staff will be fully conversant with the school’s policy and procedures in respect of child-on-child abuse and the role they have in preventing it and responding where they consider a child might be at risk.

Pupils will be empowered to raise concerns or make a report. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school will maintain accurate records in respect of child-on-child abuse that can enable statistical analysis against protected characteristics for example, age, disability, gender reassignment, race, religion, sex and sexual orientation.

The school’s procedures for managing allegations of child-on-child abuse are outlined in the school’s Child-on-child Abuse/Anti-Bullying Policy. Staff will follow these procedures, in addition to the procedures outlined in the school’s Suspension and Exclusion Policy, where appropriate.

14. Harmful Sexual Behaviour

Context

Children who display harmful behaviour and children affected by harmful behaviour

First and foremost, it is crucial that everyone within school recognises that sexually harmful behaviour happens in schools. Staff need to adopt the view “it could happen here”. To this effect safeguarding training will be provided for all members of the school community, to promote a

diligent safeguarding culture in which such situations receive a swift, proportionate and timely response that meets the needs of all affected.

KCSiE (Part Five) outlines how schools and colleges should respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence. This includes incidents occurring outside of the school or college premises, and/or online.

There are many ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have caused harm by their behaviour. It is important that school staff recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a 'victim' or would want to be described in this way.

Ultimately, school staff should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable. For this advice we use the term 'children displaying harmful behaviour'. It is important to remember that, as a child, any child displaying harmful behaviour is entitled to, deserving of, and should be provided with, a different level of support to that which might be provided to an adult who is alleged to have abused a child.

Responsibilities

Schools have a statutory duty to safeguard and promote the welfare of the children. As part of this duty school staff are required to have regard to KCSiE. Schools are required by law to have a behaviour policy and measures in place to prevent all forms of bullying and provide relationship education. Our schools play an important role in preventative education. Good practice is that which allows children an open forum to talk things through and all staff should be aware of how to support children and how to manage a disclosure.

Schools should have in place a meaningful and expert led RSE curriculum which allows for open and honest discussions about relationships.

School leaders need to be aware that Harmful sexual behaviour is a continuum ranging from being developmentally typical (healthy) to problematic to abusive.

Responding

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Some situations are clear:

- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves, and AI generated images.

Schools are not alone in dealing with sexual violence and sexual harassment; statutory partners such as CSC and the police may need to become involved in some cases. It is likely that any issues will extend beyond school. Online issues and the use of various social media platforms can extend the impact of the abuse. This is also the case for children using public transport and school transport; school leaders still have a duty to respond to all incidents they are made aware of. Even if the child has not reported directly, the school's duty to promote the welfare of children and young people remains the same i.e. that friends/peers have shared their concerns to school. It is essential that children are reassured that they are being taken seriously and will be supported and kept safe as far as is possible. A child who has been affected by abuse should never be given the impression they are creating a problem, nor should they be made to feel ashamed for making a report.

Where a report is going to be made to CSC and/or the police, then, as a general rule, the school DSL should speak to the relevant agency and discuss next steps and how the child who is the subject of an allegation will be informed of the allegations. The DSL should consider the following:

- Parents or carers should normally be informed (unless this would put a child at greater risk).
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to children's social care.
- Rape, assault by penetration and sexual assaults are crimes and must be reported to the Police. The DSL will decide whether to contact CSC. If the DSL is not available then it is school
- staffs responsibility to contact the Police and CSC. Leaving school without sharing information is not an option.

Where there has been a report of sexual violence the DSL should make an immediate risk assessment including:

- The child who has been affected by the behaviour.
- The child who has displayed the behaviour.
- Other children (and sometimes staff).
- Lessons where both parties are together. This should be an expectation that pupils are kept separately from each other in different classes
- Transport to and from school.
- Risks that may occur outside of lessons and outside of school.

Risk assessments should be recorded (written or electronic) and should be kept under review with a date identified for the review. A suitable risk assessment can be accessed here:

<https://www.brook.org.uk/ourwork/category/sexual-behaviours-traffic-light-tool>

Key school staff should be mindful of any police bail conditions. However, they should act independently. For example, when bail conditions lapses, this should not be an automatic indication that the level of risk has decreased.

Separation of pupils for safeguarding purposes

In certain circumstances, a school may need to temporarily forbid a pupil from attending its premises – for example, due to an allegation of harm by one pupil against another which requires physically separating pupils. This is not an exclusion on disciplinary grounds.

- Schools must thoroughly risk assess the situation involving the secondary senior leader i/c safeguarding before any next steps are taken.
- Where this occurs and has been agreed with the Emmaus CAT safeguarding team the school must inform:
 - Parents of the reason why the pupil has been temporarily forbidden from attending and act in conjunction with the designated safeguarding lead (or deputy).
 - The governing board must be notified without delay.
 - The Local Authority S19 provision.
 - Local authority EHCP team if a pupil has an EHCP
 - Social worker, if the pupil is open to child social care.
- This measure should only be used in rare circumstances and only when separating pupils is essential and cannot practicably be done in a way that allows one or more pupils to remain on school premises.
- The school must specifically consider its duties under the Human Rights Act 1998 and the Equality Act 2010. The public law principles of acting reasonably, rationally and in a Procedurally fair manner must be followed.
 - The local authority must arrange education for the pupil if the school itself or the pupil's parent does not do so (section 19 of the Education Act 1996).

More information and guidance around Harmful Sexual Behaviour can be found in KCSIE (Part 5).

15. Online safety, emerging digital harms, filtering and monitoring and personal electronic devices

Emmaus CAT has an Online safety policy, staff acceptable user agreement and AI policy. These should be read in conjunction to this policy.

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 breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

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

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

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Information regarding filtering and monitoring must be included in induction training

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online behaviour.
- The procedures to follow if a pupil attempts to access content on school devices which is known to be banned or identified by the filtering systems.

The school will ensure that suitable filtering and monitoring systems are in place on ICT equipment to prevent children accessing inappropriate material. School leaders will understand that filtering means that systems block inappropriate content from being accessed, and monitoring flags when a pupil attempts to access content that has been blocked by school. Schools must have both systems in place. The school will be working towards meeting the governments guidance on Meeting Digital and Technology Standards in Schools and Colleges. The school will ensure that filtering and monitoring systems that do not cause over blocking, which may cause unreasonable

restrictions as to what people can be taught online. The DSL and Lead Governor for Safeguarding will monitor and regularly review the effectiveness of filtering and monitoring at least annually, in line with KCSiE requirements.

All staff should be clear on:

The expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of their safeguarding training. For example, part of their role may be to monitor the content on pupils' screens. Staff must be aware and be able to articulate the software used by their school to filter and monitor content.

Staff must report safeguarding concerns if:

- They witness or suspect unsuitable material has been accessed.
- The pupils are able to access unsuitable material.
- They are teaching topics that could create unusual activity on the filtering logs.
- There is failure in the software or abuse of the system.
- There are perceived unreasonable restrictions that affect teaching and learning or administrative tasks.
- They notice abbreviations or misspellings that allow access to restricted materials.

School leaders must:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.

- Have effective monitoring strategies in place that meet your safeguarding needs.
- Complete the '[Plan technology for your school - GOV.UK](#) self assessment tool and be familiar with the guidance on [Generative artificial intelligence \(AI\) in education - GOV.UK](#) usage in school.

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

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The school will use face to face opportunities to offer training to parents on how to keep their child safe online. The school and curriculum areas will make it clear to parents what their children are being asked to do online for school and the risks associated with that.

Personal electronic devices / Smart Devices

The use of personal electronic devices, including mobile phones and cameras, by staff should be considered by the school, in accordance with the school's own policies and procedures. Schools should consider specified areas for staff to use their own personal devices and communicate this appropriately through relevant training and induction.

Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy and Photography Policy. Appropriate school leaders will oversee the planning of any events where photographs and videos will be taken. School leaders should consider carefully about posting photographs on the school website or social media platforms, being aware that they could be used by individuals to generate AI images. School leaders should consider whether having photographs of individual children / pupils adds value to the post.

Where photographs and videos will involve pupils who are CLA, adopted pupils, or pupils for whom there are security concerns, the Headteacher 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 school's procedures.

Staff will be made aware of the challenges that social media presents in the education sector. They will be given advice as to how to manage their own social media profiles safely and given training on school rules and expectations regarding social media. This is covered in the Staff Code of Conduct.

All schools **should be mobile-phone-free environments by default**, with phone use prohibited **throughout the entire school day**, including lessons, transitions, breaktimes and lunchtimes. This

means that school leaders must have in place, measures that enforces this. More information can be found in the Emmaus CAT use of Mobile Phones in Schools policy.

Up-skirting

Up-skirting is the act of secretly taking a photograph or video underneath another person's clothing without their consent. Up-skirting will not be tolerated by the school. Any incidents of up-skirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

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

16. Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff will be made 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. More information regarding this can be found in [UKCIS guidance Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People](#).

Where a member of staff becomes aware of an incidence of sharing nudes and semi-nudes, they will refer this to the DSL as soon as possible. They must not under any circumstances view the image themselves. They should take possession of the device and refer to the DSL who will follow their school safeguarding procedures.

17. Context of safeguarding incidents

Many safeguarding incidents can occur out of school and can be associated with outside factors.

All staff, particularly the DSL and Deputy DSLs, will know and understand the context of the school and where external safeguarding factors will occur. Staff should 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 a referral to CSC.

Staff must report concerns about a child carrying a weapon, using a weapon or expressing intent to use one to the DSL.

The DSL should then assess the risk and take “appropriate action”, including any action to de-escalate peer conflict.

18. Pupils at potential risk of greater harm

The school 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 outlined below.

Pupils who are open to a social worker or early help (family help) services

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

As a matter of routine, the DSL will hold and use information from the 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, e.g. considering the pastoral or academic support.

Absences and changes in circumstances must be reported to the child’s Social Worker, Virtual School and in some cases LA SEND team.

Electively home educated pupils

Parents may choose elective home education (EHE) for their children. This can pose additional safeguarding concerns if a pupil is not visible. All staff should be aware of the additional concerns associated with a child being withdrawn for elective home education. These concerns include: the risk of modern slavery and child sexual exploitation. School staff should not remove a child from their roll unless they have written permission from the LA, to enable them to have appropriate safeguarding and due diligence measures in place. If a child is within the social care system, the social worker should be informed immediately. If a child has SEND needs, is vulnerable or has a social worker, there should be a meeting called immediately. If not already in place, an EHA should be completed. Children who are in receipt of an EHCP or are involved with Children’s Social Care should not be removed from the school roll until the LA have been informed of the parent’s intention and have agreed.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Flexi school

Any school who enters into a flexi schooling agreement with parents must ensure that they follow the relevant guidance ensuring that children are safeguarded whilst away from school.

This is at the discretion of the Headteacher and will only be offered in exceptional cases after thorough consideration involving all stakeholders.

Children absent from education

Children who miss long periods of school are at greater risk of harm. All staff should be aware of any child who is deemed to be persistently absent or severely absent, including inexplicable and deliberately missing education. There should be processes in place to ensure safeguarding is effective when off site. This should be through the use of home visits and regular meetings to assist in the child returning to full time education. Further information regarding this can be found in the school's attendance policy and [Working Together to Improve School Attendance](#).

CLA, PLAC and kinship care

Children most commonly become looked after because they have experienced abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care. The school should be knowledgeable about trauma informed behaviours when making decisions to support pupils who fall under this bracket. The Emmaus CAT Central team can offer further advice and guidance to schools in this area.

School leaders will ensure that staff have the knowledge, skills and understanding to keep CLA and PLAC safe. This includes ensuring that the appropriate staff have the information they need, e.g.

- Looked after legal status e.g. whether a child is looked after under voluntary arrangements (section 20) with consent of parents, or 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.

The DSL/Designated Teacher will be provided with the necessary details of pupils' social workers and the VSH. This should be easily accessible and on the school CPOMS and MIS system.

Further details of safeguarding procedures for CLA and PLAC are outlined in the school's/LA CLA policy.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour changes 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 disproportionately impacted by issues such as bullying, without outwardly showing any signs. More information can be found in the school's Anti-Bullying/Child-on-Child Abuse Policy.
- Communication barriers may exist, as well as difficulties in overcoming these barriers. This may impact on the child's ability to report concerns.

- Children with SEND may have more difficulty in understanding how to keep themselves safe. More consideration must be given to the teaching of safeguarding with this group of pupils.

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+.

KCSiE recognises that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Best practice should include provision for a named teacher within school to help reduce the additional barriers faced by LGBTQ+ pupils and provide a safe space for them to speak out and share any concerns they have.

Children Questioning their Gender /Social Transitioning

Children / Pupils who may be questioning their gender, can be at greater risk of harm and require ongoing support. In-line with most recent statutory guidance, schools must have single sex toilets available for children over the age of 8. Only pupils of the same biological sex may use single sex toilet and shower facilities. School leaders should offer an appropriate alternative where possible and should liaise with parents to ensure the issue can be managed appropriately. Family Help may be offered as a further support. Incidents of any conversations or intervention must be recorded on CPOMS.

If a child is considering social transitioning schools should not initiate any action and take a "very careful approach in relation to social transition, with parents involved in the "vast majority" of cases. Particular caution should be taken in primary schools.

Pupils on school trips must not share a bedroom with another pupil of the opposite biological sex. School staff should take the time to offer a sensitive explanation and explore an adequate solution where possible.

Pupils Requiring Mental Health Support

All staff will be aware of the needs and requirements of individual pupils who may require additional support for their mental health. Staff must be made aware of any risk assessments that are in place to support the safety of pupils and the wider school community. Staff must also be aware that mental health issues can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering abuse, neglect or exploitation. Pupils who are suffering with low mental health may be at risk of self harm or suicide. Any concerns must be reported to the DSL immediately. Pupils who may have taken an overdose or be at risk of suicide, must attend A and E. School staff must be assured that this has happened, even if that means transporting them.

The school should have an appointed lead for mental health in school who will have received appropriate and funded training. Pupils will learn about how to keep themselves mentally healthy through their wider PD curriculum

Pupils with Medical Conditions

Children and young people with medical conditions are entitled to a full education and should be properly supported so that they can participate in all aspects of school life, remain healthy and achieve their academic potential. Failure to provide appropriate support may place a child at risk of harm and may therefore become a safeguarding concern.

The school will:

- Ensure appropriate arrangements are in place to identify, assess and support pupils with medical conditions.
- Work in partnership with parents, carers, health professionals and other relevant agencies to meet pupils' medical needs.
- Maintain Individual Healthcare Plans (IHPs) where required and ensure these are reviewed regularly.
- Ensure staff receive appropriate information, training and support to enable them to meet pupils' medical needs safely and effectively.
- Support pupils with medical conditions to access education, educational visits, enrichment activities and other aspects of school life wherever it is safe to do so.
- Maintain appropriate systems for responding to medical emergencies and for recording, reporting and learning from significant incidents and near misses

The Designated Safeguarding Lead (DSL) will work with relevant staff responsible for medical needs where concerns arise regarding:

- a child's health, safety or welfare;
- repeated failure to provide essential medication or medical equipment;
- medical neglect;
- attendance issues linked to unmet medical needs;
- barriers preventing a pupil from accessing education safely; or
- concerns regarding parental capacity to manage a child's medical condition

Medical conditions at school: statutory guidance - Department for Education - Citizen Space

Children with Health Needs Who Cannot Attend School (Section 19 Duty)

Some children may be unable to attend school because of physical or mental health needs.

Local authorities have a duty under Section 19 of the Education Act 1996 to arrange suitable full-

time education, or as much education as a child's health condition allows, for children who cannot attend school for a prolonged period because of health needs.

The school will:

- Work collaboratively with the local authority, parents/carers, health professionals and alternative providers to ensure continuity of education and safeguarding arrangements.
- Maintain regular contact with pupils who are absent due to health needs and support their welfare, learning and reintegration.
- Share safeguarding information appropriately with any alternative provision or education provider involved in supporting the child.
- Monitor attendance and welfare closely to ensure that pupils with medical needs do not become isolated, disadvantaged or at increased risk of harm.
- Ensure that medical absence is not viewed solely as an attendance issue and that any safeguarding concerns are responded to promptly through the school's safeguarding procedures.

The DSL will give particular consideration to pupils who are unable to attend school because of health needs, recognising that prolonged absence can increase vulnerability to:

- neglect;
- poor mental health;
- social isolation;
- exploitation;
- reduced visibility to safeguarding professionals; and
- barriers to education and wellbeing.

Where concerns arise, the DSL will work with the local authority, health professionals and other agencies to promote the child's safety, welfare and educational entitlement.

Arranging education for children who cannot attend school because of health needs

Allergy Safety

Emmaus CAT recognises that pupils with allergies may be at risk of serious harm, including anaphylaxis, and is committed to providing a safe, inclusive environment in which their medical needs are effectively supported. Allergy management forms part of the school's safeguarding and welfare responsibilities.

The school will:

- Maintain and publish an **Allergy Safety Policy** which is reviewed annually.
- Identify pupils with allergies and ensure appropriate **Individual Healthcare Plans (IHPs)** are in place for those can be life threatening or very serious. These should be reviewed annually, with parents/carers and medical professionals.

- Provide allergy awareness and emergency response training for relevant staff and ensure staff understand how to recognise and respond to allergic reactions and anaphylaxis.
- Maintain access to **spare adrenaline auto-injectors (AAIs)** and appropriate emergency medication in line with statutory guidance.
- Take reasonable steps to reduce exposure to known allergens whilst supporting pupils to participate fully in school life, including educational visits, clubs and enrichment activities.

Schools must ensure that emergency medication is available and accessible at all points of the school day, including breakfast and after-school club, and during off-site activities.

All allergy-related incidents will be recorded on CPOMS.

All staff must be aware of where medication is kept and who the Allergy Lead person is.

Schools must adhere to the statutory guidance: [Allergy safety in schools – GOV.UK](https://www.gov.uk/government/publications/allergy-safety-in-schools)

More information can be found in the Emmaus CAT Allergy and Anaphylaxis policy.

Pupils who are being supported by Youth Justice

Schools have a statutory duty under *Keeping Children Safe in Education (KCSiE)* and *Working Together to Safeguard Children* to identify and support pupils who are open to, or have been involved with, Youth Justice Services. These pupils may present complex safeguarding needs and require coordinated multi-agency support.

Key expectations for schools:

- **Information sharing:** Schools must work collaboratively with Youth Justice Services, social care, and other relevant agencies, ensuring timely and proportionate sharing of safeguarding information.
- **Designated Safeguarding Lead (DSL):** The DSL should maintain oversight of all pupils

known to Youth Justice Services and ensure risk assessments and support plans are in place. This should be in collaboration with the Virtual School

- **Education continuity:** Schools must promote access to full-time education and reintegration, recognising that exclusion or absence can heighten vulnerability.
- **Contextual safeguarding:** Staff should consider external influences such as peer groups, community factors, and exploitation risks when assessing pupils' needs.
- **Trauma-informed practice:** Training should enable staff to understand the impact of adverse childhood experiences and involvement in the criminal justice system.
- **Multi-agency working:** Schools must contribute to Youth Justice planning meetings, Early Help assessments, and safeguarding reviews as appropriate.
- **Confidentiality and proportionality:** Information shared must comply with data protection principles and be used solely to safeguard and support the pupil

Pupils who are privately fostered

A private fostering arrangement occurs when a child under 16 (or under 18 if disabled) lives with someone who is not a parent or close relative for 28 days or more, and the arrangement was made privately, not by the local authority.

Statutory duties for schools:

- Identification and awareness: School staff must be alert to situations that may constitute private fostering, such as pupils living with extended family friends, distant relatives, or non-relatives.
- Notification duty: If a member of staff becomes aware that a pupil may be privately fostered, they must inform the Designated Safeguarding Lead (DSL) immediately. The DSL must then notify the local authority as required under the *Children Act 1989 s.67*.

Schools must maintain safeguarding oversight of pupils who are privately fostered and work with the Local Authority to ensure that the arrangement does not pose a safeguarding risk. Staff should receive regular training about private fostering indicators.

19. Use of school premises for non-school activities

Where school leaders hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the school, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. School Leaders should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate.

This applies irrespective of whether children who attend any of these services or activities are on the school roll. The governing body should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

Extra-curricular clubs and charities should work collaboratively with the school to effectively safeguard pupils and adhere to local safeguarding arrangements. Organisations should provide evidence that shows safeguarding arrangements are in place.

Staff and volunteers running extra-curricular 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.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

20. Alternative Provision

The school will remain responsible for a pupil's welfare and education during their time at an alternative provision (when the school are the commissioning body). When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all

relevant safeguarding and safer recruitment checks and will complete the Emmaus CAT AP auditing tool. School leaders must ensure that the provision meets the pupil's needs and supports re-integration into mainstream education.

Schools must acquire written confirmation (including satellite sites) from AP providers that they have carried out safeguarding checks and schools must be informed of staff changes affecting risk. The school will maintain daily oversight of pupils attending alternative provision, ensuring their attendance and whereabouts are known at all times, terminating placements if necessary.

School leaders should conduct a thorough safeguarding and educational audit of any alternative provider and ensure robust safeguarding procedures are in place, especially around attendance. Please use Emmaus CAT Alternative Provision Audit Tool.

Schools must exchange relevant safeguarding information, attendance data and risk assessments with the AP provider to ensure pupils are accounted for at all times. Arrangements must be in place for the school to be aware immediate notification of absence. Absence protocols must be communicated in writing.

Further information can be obtained from [Alternative provision - GOV.UK](#) and Emmaus CAT policy for The Use of Alternative Provision.

21. Work Experience

If a school uses external providers for work experience, school staff must ensure that the provider has appropriate safeguarding policies and procedures in place, including safer recruitment procedures.

Where the school is used for work experience by others, enhanced DBS certificates, where applicable, will need to be obtained and the person must be added to the SCR.

Mandatory guidance for schools can be found here:

<https://www.gov.uk/government/publications/careers-guidance-provision-for-young-people-in-schools/careers-guidance-and-access-for-education-and-training-providers>

22. Educational Visits, Residentials and Off-Site Activities

Emmaus CAT recognises that safeguarding and child protection responsibilities apply equally during educational visits, residential trips, sporting activities, exchange visits and all off-site activities.

Appropriate risk assessments will be undertaken and safeguarding arrangements will form part of the planning process for all visits. The school will ensure that suitable supervision, staffing, communication and emergency procedures are in place and that the welfare of pupils remains paramount at all times.

All adults accompanying visits, including volunteers, will be subject to appropriate safeguarding measures, vetting and supervision in accordance with KCSiE and the school's safer recruitment procedures.

Any safeguarding concern arising during an educational visit or off-site activity will be reported and managed in accordance with this safeguarding policy and local safeguarding procedures.

Where visits involve homestays, host families or exchange arrangements, the school will ensure that appropriate safeguarding checks and risk assessments are completed in accordance with statutory guidance (KCSiE). All trips and visits should be appropriately risk assessed and where necessary uploaded onto the relevant Local Authority's Evolve platform.

23. Homestay Exchange Visits

Schools sometimes make arrangements for children to take part in exchange visits, either to other parts of the UK or abroad. Exchanges can benefit learning across a range of subjects. In particular, foreign visits can enrich the languages curriculum and provide exciting opportunities for pupils to develop their confidence and expertise in the use of other languages.

School staff have a duty to safeguard and promote children's welfare. This extends to considering their safety and how best to minimise risk of harm to those children during any exchange visit the school arranges, and when organising the care and accommodation for a child with a host family (known as homestays) as part of the exchange.

School staff will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. School staff will use professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Pupils will be provided with emergency contact details to use where an emergency occurs, or a situation arises that makes them feel uncomfortable.

Where a parent or pupil arranges their own homestay, this is a private arrangement, and the school is not the regulated activity provider.

Further guidance can be found in KCSiE.

Private fostering

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where school staff become aware of a pupil being privately fostered, they will notify the DSL who will notify CSC as soon as possible.

24. What to do if you are concerned about a child

Information regarding the specific procedures for the school can be found in **Appendix 1**. Please refer to this section of the policy to fully understand the following:

- How to report a concern about a child.
- Specific guidance about how to make a referral.
- A flow chart of what happens when a concern is reported.

25. Managing referrals

Each school will know and understand how to refer into the LA CSC and other safeguarding partners. (See appendix 5).

The school will not wait for the start or outcome of an investigation before protecting the child at risk 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 leaders 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 leaders agree with this decision, the school will consider the use of other support mechanisms, such as Early Help / Family Help and pastoral support. If school leaders disagree with the decision of the Referral and Assessment Team, they should challenge the decision through the appropriate channels. Where the LA escalation policy is used, Emmaus Central team should be informed to assist with the process.

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 is usually common but 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.

Please see **Appendix 5** for key information regarding the referral processes for each LA within the CAT. The CAT safeguarding policy should be used in conjunction with the Local Authority Safeguarding Practices for each school.



26. Safeguarding concerns and allegations against staff

It is important that staff within the school foster an attitude of “it could happen here” and allegations might be made. Staff must report any behaviour they feel may pose a risk to the pupils in their school. If something does not look or feel right, then the chances are it requires professional curiosity. School leaders will ensure that all allegations against staff, including those who are not employees of the school are dealt with appropriately and school leaders liaise with all relevant parties.

When managing allegations against staff, school leaders will recognise the distinction between allegations that meet the harms threshold and those that do not, also known as “low-level concerns” as defined in KCSiE. Allegations that meet the harms threshold could include, but are not limited to the following instances:

- Behaved in a way that has harmed a child or may have harmed a child.
- Committed or possibly committed a criminal offence relating to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Been negligent in following safeguarding policies or procedures.
- Behaved or may have behaved, in a way that indicates they may not be suitable to work with children.

Concerns that meet the threshold must be referred to the LADO via the LA reporting procedures.

Low level concerns should be reported to the DSL and a record should be kept securely following school procedures. Appropriate training should be signposted via the National College CPD platform.

All allegations of abuse against staff must also be reported to the Emmaus CAT central team. Further information can be found in Appendix 3.

A commitment to training, sharing and reading appropriate policies and guidance and undertaking lessons learned events are key to ensuring staff have the appropriate skills and understanding to limit the risk of allegations.

27. Communication and confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. This should be done with the pupil's best interest in mind. Sharing of information regarding safeguarding matters should be undertaken on a need to know basis and this should be fully risk assessed and reviewed by the DSL.

Communication between staff and pupils should be done professionally through school recognised communication platforms. Staff should not communicate with other staff on a professional basis through their own personal emails or social media platforms. Communication should be respectful and dignified at all times and there should only be an expected response during accepted work hours. School staff should be mindful of their audience when communicating information within group emails. What's App or social media platforms should not be used to communicate information about work. If using these platforms for a social capacity, staff should be reminded that they are still operating in a work capacity and therefore should remain professional and fully aligned with teacher standards and trust and school values.

When communicating safeguarding information staff should be mindful of keeping the child's best interests as a priority, whilst fulfilling safeguarding obligations.

When communicating with individuals outside of the school community, secure emails must be used. If that is not possible then documents and data should be password protected and the password should be sent in a separate email.

Emails should carry a data protection statement in the signature with guidance for situations where an email is received in error.

Communication with parents/carers

Information should only be shared with an adult who is named on the school's MIS, unless they are a recognised agency. Sharing of information should happen with parental consent unless parental consent puts the child at further risk.

More information around sharing of information can be found in KCSiE.

28. Safer recruitment

Safer recruitment is an essential part of safeguarding and promoting the welfare of children. The purpose of safer recruitment is to help deter, identify and reject individuals who may pose a risk

to children, and to ensure that those appointed to work with children are suitable to do so. While no recruitment process can provide absolute protection, rigorous safer recruitment practices, combined with ongoing vigilance, contribute to a strong safeguarding culture in which the welfare of children is paramount.

Emmaus CAT recognises that a small number of individuals may seek positions in education in order to gain access to children and cause harm. Therefore, safer recruitment procedures are a critical first line of defence and will be applied consistently and robustly to all recruitment, selection and appointment processes, in accordance with Keeping Children Safe in Education (KCSiE) and relevant safeguarding legislation. Safer recruitment is not a one-off event but forms part of a continuous commitment to safeguarding, extending throughout an individual's employment, volunteering or leadership and governance role.

Regulated Activity

Emmaus CAT and school leaders will ensure that all individuals engaging in regulated activity with children are subject to the appropriate level of safer recruitment and vetting checks, in line with KCSiE. Regulated activity includes certain roles involving unsupervised teaching, training, instruction, care or supervision of children. Individuals barred from regulated activity will not be permitted to engage in such work.

Recruitment, Selection and Employment

Emmaus CAT recruitment and selection procedures are designed to identify, deter and prevent unsuitable people from working with children. The recruitment process will:

- clearly state Emmaus CAT's commitment to safeguarding and promoting the welfare of children;
- include safeguarding responsibilities within job descriptions and person specifications;
- require applicants to complete an application form and provide a full employment history;
- scrutinise applications and investigate any discrepancies, anomalies or gaps in employment;
- obtain and consider references in accordance with statutory guidance (two references - one of which must be from their most recent employer and their most recent employment where they have worked with children); If references are weak or pose questions, this should be followed up with the employer.
- undertake online searches of shortlisted candidates as part of due diligence checks;
- assess candidates' suitability and attitudes towards safeguarding children throughout the selection process;
- include safeguarding-focused interview questions;
- ensure appropriate safer recruitment training is undertaken by those involved in recruitment activities
- Carry out all statutory pre-employment checks before an individual commences work, in line with KCSiE - Including the correct level of DBS checks

Duty to Refer and Reporting Responsibilities

Emmaus CAT and school leaders recognise their legal responsibilities to refer cases to the Disclosure and Barring Service (DBS) where the legal referral criteria are met. This includes circumstances where an individual has harmed, or poses a risk of harm to, a child and has been removed from regulated activity, or would have been removed had they not resigned or otherwise left their role.

Emmaus CAT along with school leaders will also make referrals to the Teaching Regulation Agency (TRA) where there is evidence that a teacher's conduct may be serious enough to warrant consideration of a prohibition order. Allegations and concerns relating to staff, supply staff, contractors and volunteers will be managed in accordance with Part Three of KCSiE and other relevant statutory guidance.

Further details regarding safer recruitment procedures are contained within the Trust's Safer Recruitment Policy, which should be read alongside this Safeguarding and Child Protection Policy

29. Single Central Record (SCR)

Emmaus CAT, along with school staff, maintain a Single Central Record (SCR) in accordance with statutory requirements. At a minimum, this will hold relevant information for:

- Employees
- Support staff
- Agency workers
- Trainee teachers
- Governors and trustees
- Volunteers (if involved in regulated activity)
- Any other individuals required by KCSiE

The SCR should be kept up to date and only contain active members of staff and regular visitors.

Further information can be found in the Emmaus CAT Safer Recruitment policy, along with Part Three of KCSiE.

30. Handling Disclosures

Whenever a child reports that they are suffering or have suffered significant harm through abuse or neglect, or have caused or are causing harm to others, the initial response should be limited to listening carefully to the child. If someone makes a disclosure this might be the only time they will tell someone about what is happening. It is therefore imperative that the member of staff hearing the disclosure shows empathy and understanding and avoids showing shock or an emotional response. This should be recorded as soon as possible on CPOMS and where possible in the child's voice.

Further training can be accessed by all staff via the National College platform. If a member of staff requires further support in this area, they should approach their DSL. More information regarding this can be found in part one of KCSiE

31. Recording and Reporting

All concerns, discussions and decisions made with the reasons for those decisions, should be recorded in writing using CPOMS. This will also help if/when responding to any complaints about the way a case has been handled by the school or if the school is required to participate in court proceedings or contribute to safeguarding practice review

Records should include:

- a clear and comprehensive summary of the concern that highlights the impact on the child and family
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

If in doubt about recording requirements, staff should discuss with the DSL or DDSL. It is important that the DSL and Lead Governor for Safeguarding quality assure CPOMS reports and record any necessary action

Please refer to Emmaus CAT CPOMS guidance and Emmaus CAT CPOMS Policy.

32. Training (Please see appendix)

All staff must undertake regular safeguarding training to be sufficiently equipped to recognise, respond to and action safeguarding concerns. Statutory training will be delivered via National College and records will be monitored and followed up by the DSL. Contextual safeguarding will be delivered via briefings, email, safeguarding snippets or other platforms that the DSL may use.

DSL/DDSL

The DSL/DDSL is required to undertake specific training for their role at least every two years. However, they should seek opportunities to educate themselves on new and ongoing issues that reflect the school context.

Headteacher /Lead Governor for Safeguarding

The Headteacher/Lead Governor for Safeguarding should undertake DSL training to fully understand the role of the DSL in school and be able to make strategic decisions. They should also receive specific training about making referrals to LADO and managing staff allegations.

All staff

All staff should fully engage with safeguarding training throughout the academic year. This may include but is not limited to:

Induction training

Induction training should include how to report concerns including concerns about staff, the context of the school and key information regarding the school culture including expectations of all staff. Induction training should also include information regarding filtering and monitoring, including what to do if systems are infiltrated and who to report concerns to and the roles of responsibilities to do with filtering and monitoring.

Face to face training for all staff

This should include information about the context of the school and any changes in school policies, procedures or practice. A diligent safeguarding culture should be promoted that reinforces the fact that “it can happen here”. Face to face training should include any statutory requirements and guidance updates.

Online training

National College have a wide selection of safeguarding related training modules. All Emmaus CAT schools have subscriptions to National College. More information can be found in appendix 5.

Training Record Keeping

A comprehensive training log should be maintained by the DSL. Records relating to all safeguarding training will be kept within the National College platform. Any training completed outside of the National College offer, must also be uploaded onto the National College platform.

School leaders should be assured that any third party workers have completed appropriate and recent (in the last 12 months) safeguarding training. Emmaus CAT Central Team will monitor training records as part of audit procedures.

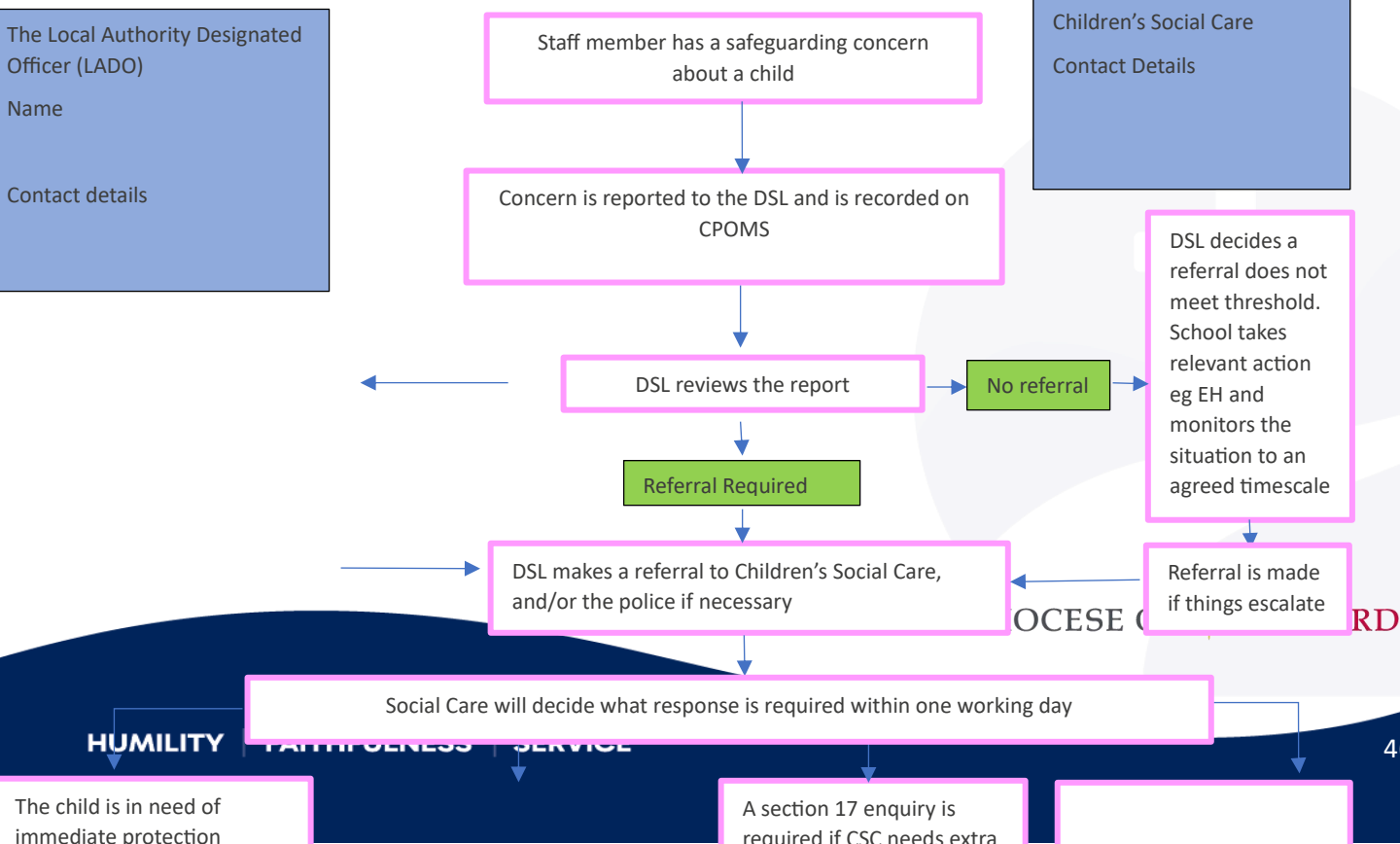
33. Monitoring and review

This policy is subject to annual review, and additionally when changes to legislation and/or guidance is issued. The CAT and all school governing bodies will exercise their responsibilities in monitoring and reviewing in line with their statutory obligations.

It is all staff's responsibility to read and understand this policy along with other key safeguarding policies and part one of the most recent version of Keeping Children Safe in Education.

Appendix 1

Flowchart of procedures for responding to safeguarding concerns



A section 47 enquiry is required by CSC if they have reasonable cause to suspect a child is suffering or likely to suffer significant harm

A Strategy meeting may be convened

The referrer will be informed

All concerns must be logged on CPOMS. The child's circumstance will be kept under review at all stages and a referral will be made again if it is appropriate for improving the child's circumstances. The child's best interest must always come first

If the concern is about a staff member/volunteer in your school, the DSL/Headteacher should refer this to the LADO who will determine the best route of action

If your concern would involve a Prevent/Channel referral contact:

If you have a concern that a girl has undergone, or is about to undergo, FGM, contact the police and CSC immediately

Appendix 2 – Other Specific safeguarding issues

This appendix clarifies specific safeguarding issues that pupils may experience and outlines responses to be taken. These issues include but are not limited to:

1. Domestic abuse
2. Homelessness
3. Attendance as a safeguarding indicator
4. Child abduction and community safety incidents
5. Child criminal exploitation (CCE)
6. Cybercrime
7. Child sexual exploitation (CSE)
8. Modern slavery and Trafficking
9. FGM
10. Forced marriage/child marriage
11. Radicalisation

12. Pupils with parents or carers in prison
13. Pupils required to give evidence in court
14. Mental health (including eating disorders, self-harm)
15. Serious violence
16. Fabricated illness (formerly known as Munchhausen's by proxy)
17. Young Carers

Domestic abuse

Domestic abuse can have a significant impact on children and young people and may affect their safety, health, wellbeing, attendance, behaviour, emotional development and educational outcomes. Children who experience domestic abuse are victims in their own right.

In accordance with the Domestic Abuse Act 2021, domestic abuse is any incident or pattern of incidents of abusive behaviour between individuals aged 16 or over who are personally connected.

Abuse can include, but is not limited to:

- Physical abuse
- Sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse
- Psychological or emotional abuse

Individuals are personally connected where they:

- Are, have been, or have agreed to be married to one another.
- Are, have been, or have agreed to enter into a civil partnership with one another.
- Are, or have been, in an intimate personal relationship with one another.
- Have, or have had, a parental relationship in relation to the same child.
- Are relatives.

The school recognises that domestic abuse may be a single incident or a pattern of behaviour and that children may experience its effects directly or indirectly by seeing, hearing or living with the impact of abuse.

All staff will be aware that exposure to domestic abuse can be a safeguarding concern and may present through:

- Changes in behaviour or emotional wellbeing.
- Poor attendance or persistent absence.
- Anxiety, withdrawal or low self-esteem.
- Aggressive or challenging behaviour.
- Unexplained injuries or concerns regarding a parent or carer.
- Changes in presentation, attainment or engagement with school.

Where domestic abuse is known or suspected, staff will report concerns in accordance with the school's safeguarding procedures. The DSL will assess risk, consider the need for support or referral, and work with relevant agencies to safeguard and promote the welfare of the child.

Operation Encompass is the statutory information-sharing partnership between police and educational settings. Operation Encompass enables schools to receive timely information from the police about children who have experienced domestic abuse.

In accordance with statutory guidance, police will notify the school when they attend an incident of domestic abuse and there is a child connected to the household, whether or not the child was present at the incident.

The purpose of Operation Encompass is to ensure that schools are able to:

- Understand and respond to a child's immediate needs.
- Provide appropriate support and safeguarding measures.
- Consider the impact on the child's emotional wellbeing, behaviour, attendance and learning.
- Work proactively to reduce the risk of further harm.
- Ensure that vulnerable children receive support at the earliest opportunity.

Operation Encompass notifications will be received by the Designated Safeguarding Lead (DSL) and/or appropriately trained Deputy DSLs through a secure communication system.

Arrangements will be in place to ensure notifications can be reviewed and acted upon when the DSL is unavailable through a shared mailbox which can be accessed by other authorised safeguarding staff.

The DSL will consider each notification alongside other safeguarding information held by the school, undertake an appropriate risk assessment and determine what support, intervention or referral may be required.

All information received through Operation Encompass will be treated as confidential safeguarding information and managed in accordance with data protection legislation, safeguarding requirements and the school's child protection procedures.

The school will ensure that DSLs and Deputy DSLs receive appropriate Operation Encompass training and maintain an understanding of local procedures and responsibilities.

Homelessness

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns 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”.

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. An early help assessment should be completed for anyone who is at risk of becoming homeless. More helps and support with housing issues can be found on the following website:

[Home – Shelter England](#)

Attendance as a Safeguarding Indicator

KCSIE makes clear that attendance is a safeguarding issue, not simply an educational or pastoral concern. Staff should understand that poor attendance, unexplained absence, persistent absence, severe absence and children missing education may be indicators that a child is at risk of harm, abuse, neglect, exploitation, poor mental health, or other unmet needs.

A child who is not attending school regularly is less visible to professionals and may lose access to the protection and support that school provides. For this reason, attendance concerns should always be considered alongside other safeguarding information and not viewed in isolation.

Staff will monitor pupils who are absent, particularly on repeat occasions, and liaise with the DSL in line with school and LA safeguarding procedures. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more (missing from education). Children whose whereabouts cannot be established must be brought to the immediate attention of the LA and where appropriate the police should complete a safety and welfare check.

Admissions Register

Pupils are placed on the admissions register at the beginning of the first day agreed by the school, or when the school has been notified of their start date. School staff responsible for admissions will notify the LA within 5 days of when a pupil's name is added to the admissions register.

School staff will ensure the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Parents must be actively encouraged to report any change of circumstances that will affect the admissions register.

A school cannot retrospectively delete a pupil's name from the admissions register. A pupil's attendance must be recorded up until the date that the pupil's name is deleted from the Admissions register. Further information can be found in the DfE statutory guidance. This must be read and understood by those who are involved in attendance and admissions procedures.

A pupil should not be removed from the school's admission register without receiving written confirmation from the Local Authority

[Working together to improve school attendance – GOV.UK](#)

KCSIE 2026 continues the expectation that **schools should hold more than one emergency contact number** for every child wherever possible. This is linked to safeguarding and children missing education (CME), rather than being an admissions requirement alone. This gives schools additional options to make contact with a responsible adult when a child is absent and where a welfare or safeguarding concern exists.

Child abduction and community safety incidents

Child abduction is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the child, and strangers.

All school staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils. Appropriate risk assessments should be considered in such circumstances.

Pupils will be provided with practical advice in lessons to ensure they can keep themselves safe outdoors for example stranger danger strategies. This will be underpinned by a carefully planned and well sequenced PSHE curriculum.

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 child needs or wants.
- For the financial advantage or other advantage of the perpetrator or facilitator.
- Through violence or the threat of violence.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Encouraging children to accrue drug debts to foster dependency leading to drug trafficking.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

School staff 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 and will follow school safeguarding procedures.

School staff 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:

- Appearing with unexplained gifts, money or new possessions.

- Associating with other children involved in exploitation.
- Experiencing 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.

County Lines

County Lines refers to gangs and organised criminal networks that exploit children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

In addition to 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.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owning a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider a referral to the National Referral Mechanism on a case-by-case basis, in line with statutory agency arrangements and other providers who offer support to victims of county lines exploitation.

Cyber-crime

Cyber-crime is defined as criminal activity committed using computers and/or the internet (including mobile phones).

This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.

- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence e.g. corruption of school IT networks.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

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.

School staff 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.

School staff 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.

School staff also recognise that pupils may not realise they are being exploited, e.g. 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.
- Experiencing changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly absent from school or education or not taking part.
- Having older partners.
- Having sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, school staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA as appropriate. The LA will then provide/advise on the appropriate response.

Modern slavery and Human Trafficking

Modern slavery encompasses human trafficking, slavery, servitude, and forced or compulsory labour. It involves the exploitation of individuals for personal or commercial gain, often through coercion, deception, or abuse of vulnerability. School staff must be aware of the following and report any concerns to the DSL immediately.

KCSiE 2026 key expectations for schools:

Awareness and training:

All staff must receive safeguarding training that includes recognising indicators of modern slavery and trafficking.

Indicators:

Staff should be alert to signs such as unexplained absences, poor living conditions, signs of physical abuse, fear of authority, or pupils being controlled by others.

Reporting:

Any concerns that a child may be a victim of modern slavery or trafficking must be reported immediately to the Designated Safeguarding Lead (DSL), who will refer to Children's Social Care and, where appropriate, the National Referral Mechanism (NRM).

Multi-agency cooperation:

Schools must work with local safeguarding partners, police, and social care to ensure victims are protected and supported.

Education and prevention:

Schools should promote awareness among pupils about exploitation and provide safe spaces for disclosure.

FGM

FGM is defined as any 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.

School 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 or prosecution. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they are under a

legal obligation to personally report to the police where an act of FGM appears to have been carried out. The DSL must be notified of any situation involving known or suspected FGM and school safeguarding procedures must 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 and PE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo routine medical examinations.
- Asking for help, but not being explicit about the issue due to embarrassment or fear.

FGM is included in the definition of "honour or faith-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.

Radicalisation

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

Extremism refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs.

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 is 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. School staff will be alert to the risk of pupils being radicalised and drawn into extremism and/or terrorism and follow local safeguarding procedures.

School staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. School 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 referral to CHANNEL through the Prevent duty. This should be done via the national PREVENT referral form(linked below)

National Prevent referral form

The school will work within local safeguarding arrangements at all times. School staff will ensure that they engage with parents and families, recognising they are often in a key position to spot signs of radicalisation. However, parents may also be influential in such behaviour, hence the need for a **comprehensive risk assessment** that covers this issue.

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 all school staff will undertake Prevent awareness training appropriate to their role.

Under the Prevent Duty, section 26 of the Counterterrorism 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".

Incel ideology and extreme toxic masculinity

Incel ideology and extreme toxic masculinity also fall under this category because they promote misogynistic and extremist narratives and encourage hostility and violence towards women. They can be linked to radicalisation pathways online. They are also associated with extremist online communities that groom and manipulate vulnerable young males. The DSL should make school staff aware of the language and symbols that may be used by pupils who are associated with this ideology.

The Prevent Duty will form part of the school's wider safeguarding obligations.

Pupils with parents or carers in prison

Pupils with parents or carers in prison will be offered pastoral support as necessary. Early Help considerations should always be included here. 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.

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. [Primary schools only]. Pupils will be provided with the booklet 'Going to court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns. [Secondary schools and post-16 settings only]. Pupils will be provided with the booklet 'Going to court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns. These booklets have been updated in 2024.

Children Giving Evidence in Court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Pupils will be provided with the relevant age-appropriate booklets below:

[ywp-5-11-eng.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115441/ywp-5-11-eng.pdf). [ywp-12-17-eng.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115442/ywp-12-17-eng.pdf).

These booklets have been updated in 2024.

Mental Health

School staff will be made aware that mental health issues can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation. School staff will not attempt to make a mental health diagnosis as this will be carried out by qualified mental health professionals where necessary.

Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health difficulty or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will speak to the DSL or deputy DSLs in the first instance to obtain advice and guidance. The school will utilise a range of resources to assist in identifying pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Mental Health Policy will be referred to. Children whose attendance is impacted by mental health issues should be offered early help. Positive mental health and wellbeing, including strategies to improve mental health should be included in the school's curriculum.

If staff believe a child is in immediate danger, they should take urgent action, including calling 999, taking the child to A&E immediately, or contacting 111 where the situation is not an

emergency. When parents have agreed to take a child to A&E or other crisis appointment, school staff should be assured that this has happened. Where a pupil is at a high risk of harm, an agreed safety plan/risk assessment should be put in place at the earliest opportunity.

Serious violence

Through regular and ongoing safeguarding training, all school staff will be made aware of the indicators that may suggest a pupil is at risk of, or involved in, serious violent crime. Staff will understand that concerns may arise from a single indicator or a combination of factors, and that early identification is essential.

Indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships or social groups.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A marked change in emotional wellbeing or behaviour.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions, which may indicate exploitation.

Staff will also be made aware of key risk factors that can increase a pupil's vulnerability to becoming involved in serious violence. These include, but are not limited to:

- Being male.
- Frequent absence from school.
- Permanent exclusion from school.
- Experiences of child maltreatment.
- Previous involvement in offending, including theft or robbery.

Any staff member who suspects that a pupil may be vulnerable to, or involved in, serious violent crime must immediately report their concerns to the Designated Safeguarding Lead (DSL). Staff will follow the school's safeguarding procedures without delay. If a member of staff suspects a pupil is carrying, using or intending to use a weapon, they should report this to the DSL immediately who should carry out a thorough risk assessment

Fabricated or Induced Illness (FII)

Fabricated or Induced Illness (FII) is a form of child abuse where a parent, carer or another person exaggerates, fabricates, or deliberately induces symptoms of illness in a child. This may lead to unnecessary medical investigations, treatment or interventions and can cause significant physical, emotional and psychological harm to the child. The school recognises that FII is a safeguarding concern requiring a child protection response. Staff should be aware that concerns may arise where:

- Reported symptoms are not consistent with the child's presentation.

- There are frequent or prolonged medical appointments, tests or treatments without a clear explanation.
- The child's attendance, participation or educational progress is adversely affected by reported medical needs.
- There are inconsistencies between information provided by parents or carers and observations made by professionals.
- A child appears to be undergoing unnecessary medical assessment or intervention.

Staff should maintain professional curiosity and be alert to patterns of behaviour that may indicate a child is being harmed through fabricated or induced illness.

Any concerns regarding FII must be reported immediately to the Designated Safeguarding Lead (DSL). Staff must not attempt to investigate concerns independently or discuss suspicions directly with parents or carers.

The DSL will consider all available information, seek advice from the Emmaus CAT Central Safeguarding Team where appropriate, and work with health professionals, children's social care and other agencies in accordance with local safeguarding procedures. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, a referral will be made to Children's Social Care.

All concerns, discussions and decisions relating to FII will be accurately recorded and retained in accordance with the school's child protection recording procedures. School staff who suspect FII is happening must report their concerns to the DSL who will liaise with social services and the police and must follow local child safeguarding procedures.

Young Carers

Schools and colleges should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Appendix 3

Good working practice (Please also see Emmaus CAT Code of Conduct)

Staff guidelines

In line with safer working practices, the staff Code of Conduct/Staff Behaviour policy, staff should be guided by safer working practices and the following advice to avoid false allegations and situations which may give rise to misinterpretation:

- Avoid whenever possible unobserved situations of one-to one contact with a child. If they are unavoidable, always keep a door open and try to ensure that staff are within the hearing of another member of staff and there is a clear purpose to the activity.
- Do not transport children alone in a vehicle. If this is absolutely unavoidable, notify the DSL as soon as possible. The child should sit in the back seat of the vehicle in such circumstances. Both the child and member of staff should carry a mobile phone. Any concerns must be reported immediately to the DSL and followed up with a written statement. Staff using their own vehicle must hold appropriate business insurance, and parental consent should be obtained before transporting a child.

Staff should be mindful that off-site environments present greater opportunities for contact between children and staff, both formal and informal, and staff in all their dealings with children, should be guided by the following advice:

- Never make suggestive or discriminatory comments to a pupil.
- Avoid “favouritism” and singling pupils out.
- Never trivialise child abuse or safeguarding matters.

- Issue clear guidance and codes of conduct to staff and pupils prior to the visit.
- Ensure there is a clear education, Trips and Visits Policy in place that identifies potential safeguarding issues.
- Ensure the school has an appointed Educational Visits Coordinator (EVC) to oversee the organisation and safety of all school trips and visits.
- Ensure all trips and visits are underpinned by detailed risk assessments for the activity.

Safeguarding concerns and allegations against staff or another adult in the school (including supply teachers, volunteers, and contractors):

Safeguarding allegations or concerns (no matter how small) may be made against a member of staff, a volunteer, a governor, a pupil, parent or other person connected to the school.

Safeguarding allegations or concerns against staff will be dealt with according to the statutory guidance set out in Part 4 of KCSiE and local authority procedures. It will be followed in respect of all cases in which it is alleged that a teacher or member of staff (including a volunteer) has:

- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child; or
 - behaved towards a child or children in a way that indicates they may pose a risk of harm if they work regularly or closely with children
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children
- Further information: Making barring referrals to the DBS – GOV.UK (www.gov.uk)

Staff and volunteers who hear a safeguarding allegation or concern (no matter how small) against another member of staff or volunteer must immediately report the matter to the DSL or Headteacher, unless the DSL is the person against whom the allegation is being made, in which case the allegation must be made to the Headteacher. If the accused is the Headteacher it should be reported to the Chair of Governors. In the case of alleged serious harm, the DSL/Headteacher must inform the police immediately.

Where there is a conflict of interest in reporting a matter to the head teacher or DSL the school whistleblowing procedures should be followed.

In the event of a safeguarding allegation being made against a member of staff, the DSL will immediately, and without further investigation, refer the matter to the LADO. **The Emmaus CAT Central team must also be informed.** It is essential that all information pertinent to the case be communicated to the LADO as the failure to pass on a critical piece of information could materially affect the advice given. The LADO's advice will be sought in borderline cases. The LADO's role is not to investigate the allegation but to ensure an appropriate investigation is carried out. Where an investigation by the police or local authority children's social care services is unnecessary, the LADO's advice should be taken as to how the allegation should be dealt with; it is sometimes appropriate that school leaders (or Emmaus CAT) should investigate the allegation. and, as required, deal with the member of staff in accordance the school's disciplinary

procedure. The adult to whom the allegation/concern relates should not be informed without the explicit consent of the LADO.

If there is a conflict of interest in reporting a safeguarding concern to the DSL/Headteacher, or in the event of an allegation being against the Headteacher or a member of the Governing Body, the Chair of Governors or, in their absence, the Lead Governor for Safeguarding (LGS), should be contacted immediately to determine whether the details of the allegation are sufficient to warrant an investigation.

If there is reason to suppose abuse could have occurred, The Chair of Governors in conjunction with Emmaus CAT will take appropriate action. This action should include an immediate referral to the LADO who will provide further advice on how to manage the situation appropriately.

Advice should always be sought from the LADO in any safeguarding allegation. However, the member of staff who an allegation has been made against should be advised to contact their trade union representative, if they have one. The school/Emmaus CAT will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case and offer support where appropriate.

If the allegation or concern relates to a member of supply staff, the agency will be notified and fully involved. Allegations or concerns against a member of staff who no longer works at the school (and historical allegations) will be referred to the police. The parents of the pupil will be informed of the allegation as soon as possible, unless external agencies such as the police advise otherwise. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process through the normal school procedures.

Low level concerns

Emmaus CAT promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This includes sharing any concerns about adults, no matter how small, responsibly and with the right person, recorded and dealt with appropriately. Doing so should encourage an open and transparent culture; enable the school to identify any inappropriate, problematic or concerning behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with Emmaus CAT ethos and values.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the local authority harm threshold. 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 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 considered serious enough to consider a referral to the LADO. If in any doubt regarding information shared about a member of staff as a low-level concern meets the harm threshold then the school will consult with the LADO.

Examples of behaviour regarded as a low-level concern could include, but are not limited to:

- humiliating pupils;
- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.
- engaging with pupils on social media platforms.

When dealing with low level concerns all schools will follow the staff code of conduct, behaviour policies and safeguarding policies; ensuring that procedures are implemented effectively, and appropriate action is taken in a timely manner to safeguard pupils. Low level concerns must be reported to the DSL who will inform the Headteacher of such concerns. Alternatively, if preferred, a concern might be reported directly to the Headteacher. If the low-level concern relates to the DSL then such concerns should be reported directly to the Head teacher. If the concern is about the Headteacher then this should be referred to the Chair of Governors.

Reports of low-level concerns will be recorded in writing by the DSL, noting who raised the concern (unless wishing to remain anonymous, which should be respected as much as is reasonable), details of the concern, the context in which the concern arose and the action taken. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

Whistleblowing

All staff are required to report any concerns to the DSL/Headteacher about poor or unsafe safeguarding practices in school; potential failures to properly safeguard the welfare of pupils or any action by staff or pupils that represent a safeguarding risk. If a member of staff feels unable to share a concern with the Headteacher then they should contact the Chair of the Governors. Staff should be aware that the NSPCC whistleblowing advice line – 0800 800 5000/help@nspcc.org.uk – is available for staff who do not feel able to raise safeguarding concerns internally.

The CAT/school's Whistleblowing Policy is available on the school website. It should also be displayed prominently in key places within the school building.

Self-Reporting

If you have been involved in an accident, incident, conversation or situation which has made you feel uncomfortable, that might have been misinterpreted, or you feel might be used against you, report this to the DSL. This might include:

- A suggestive comment from a pupil.
- Accidental or embarrassing physical contact.
- A misunderstanding.
- A confrontation.
- An instance where physical restraint or reasonable force was necessary
- Situations in which staff have become aware pupils have requested social media profiles or have been named by pupils on social media platforms

All school staff must be made aware of and adhere to the school's policy in relation to conduct and presence on social media. Further information regarding this will be found in the school's Online Safety policy.

DfE guidance (2026) now includes statutory recording and reporting duties for incidents involving the use of force [Use of reasonable force in schools - GOV.UK](#).

Appendix 4

Visitor Protocols

Before allowing visitors into the school, staff must ensure that the identity of any visitor has been confirmed by checking of photo ID badges or otherwise checking with an appropriate person or organisation (e.g. contacting the company head office, parent or member of staff expecting the visitor, if that visitor is already known to them).

All visitors must sign-in and be issued with a Visitor Badge, and their attention must be drawn to any health and safety and safeguarding information.

Visitors may be unaccompanied only if the school has previously received confirmation from their employing organisation that they have had a DBS check, and the school is willing for that person to be in the school unaccompanied. They will receive the correct colour coded lanyard/visitor badge.

It is good practice for all visitors to receive a colour coded visitor lanyard. Visitors who do not have the relevant clearance must not be left unaccompanied at any time in areas where children are present.

All contractors carrying out work in the school should be met and a site induction carried out by the Site Manager or Business Manager before work commences.

Introduction

The purpose of this guidance is to safeguard all pupils, teachers, support staff, governors, parents, visitors and on-site contractors while they are on the school premises. The aim is to

ensure that pupils, teachers, support staff, governors, parents, visitors and onsite contractors can enjoy an environment where they are safe from harm.

The guidance applies to:

- All teaching and support staff employed at the school.
- All external visitors entering the school site during the school day or for after school activities (including peripatetic tutors).
- All parents.
- All pupils.
- Building maintenance contractors.

Visitors Invited to the school

Before a visitor is invited to the school consideration should be given to the purpose of their visit, risks posed to children and appropriate authorisation sought where required. Staff will provide details of visitors to the main office.

Consideration must be made when inviting external speakers to the school, to ensure that the content of what is being delivered is in keeping with the values and ethos of Emmaus CAT.

Maintenance contractors will primarily be engaged to work during out of school hours. They must

meet with the Site Manager or Business Manager when they arrive on site. Contractors should also supply a copy of their insurance documents prior to commencement of work. All contractors carrying out emergency work during term time will be accompanied by site staff at all times.

Visitors must report to the main school reception first. They must not enter the school via any other entrance. This will include excluded or suspended pupils who are escorted by staff when on site. Directions to the school reception should be clearly signposted at all entrances to the school.

At reception, all visitors must report to a member of reception staff and state the purpose of their visit and who has invited them. This will be verified by the receiving member of staff. The receiving member of staff must ensure that they have confirmed the identity of the visitor. For example, for a contractor, the receptionist will confirm identity via a company ID badge, or by ringing the company head office. If the visitor is a member of a pupil's family who is unknown to the office, their identity should be verified by the parent of the pupil.

All visitors are required to sign the Visitors Record Book or electronic sign in systems located in reception. Vehicle registration numbers must be logged.

All visitors, including contractors will be required to wear an identification badge. Colour coded lanyards should be given to members of the public and other visitors. Only regular, checked and vetted visitors will be given a lanyard which indicates a suitability to be in school unaccompanied.

Visitors must be escorted to their point of contact by a member of staff (if prior notice of the visit has been received), OR their point of contact will be asked to come to reception to receive their visitor (if the visitor is unexpected).

If the fire alarm sounds all staff must immediately escort their visitors to the evacuation assembly point.

Visitor health and safety information

- As a visitor you have a legal responsibility to care for the health and safety of yourself and others.
- Any accidents, near misses or defects you observe must be reported to the school office.
- The school operates a no smoking or vaping policy.
- If the fire alarm should sound, leave the building by the nearest exit and proceed to the designated assembly point.
- Should you discover a fire, operate the nearest alarm, and follow the exit procedure above.

On departing the school, visitors should leave via the main school reception and:

- Enter their departure time in the Visitors Book alongside their arrival/entry.
- Return identification badge to reception staff.

Unknown/uninvited visitors to the school

Any visitor to the school site who is not wearing a school visitor badge should be challenged politely to enquire who they are and their business on the school site. They should then be escorted to the main school reception to sign the Visitor's Book and be issued with an identity badge where appropriate. The above procedures then apply.

In the event that the visitor refuses to comply, they should be asked to leave the site immediately and the Headteacher and DSL should be informed promptly. They will consider the situation and decide if it is necessary to inform the police and initiate the school lockdown procedures.

Parent helpers/volunteer staff and governors

All parent/helpers, volunteers and Governors should comply with DBS procedures, completing a disclosure form when requested to do so. It is mandatory for volunteers to be subjected to an enhanced DBS with barred list check. DBS checks for volunteers are free of charge. New helpers will be asked to comply with this policy by the member of staff who they first report to when coming into the school for an activity or class supporting role. All volunteers who are regular visitors to the school should receive appropriate safeguarding induction training. More information can be found in the safer recruitment and volunteer policy.

Contractors

Contractors include people engaged to perform work who are not directly employed by the school. In many instances work processes will be carried out near classrooms, playgrounds or other areas occupied by pupils or staff while the school is in operation. The contractor must provide an up to date and accurate letter of assurance.

It is important that good lines of communication between the school and contractor are established before work commences to ensure that health and safety issues and supervision are appropriately managed.

Appropriate supervision is deemed to be where the work is either in an area which is constantly supervised or within sight of a member of the school's workforce, or where the work being carried out is physically cut off from the children by means of closed doors, fencing or gates. There should be no opportunity for children/young people to engage in conversation with a contractor without being observed by another member of staff.

All contractors should be issued with a code of conduct and the school's safeguarding procedures.

If school staff are concerned with inappropriate activities being undertaken these should be raised immediately with the DSL who will liaise with the Headteacher and contractor.

The School Site Manager is responsible for ensuring that a site induction, including information about safeguarding, is shared with contractors who visit the site. The site manager must communicate the impact of any work being undertaken to relevant members of the school community.

Appendix 5 – National College mandatory safeguarding training

All Emmaus CAT schools have a trust membership to the National College platform which gives full access to the suite of webinars, articles and training courses.

Face-to-face DSL training and other updates will still be provided by the Central Safeguarding Team in addition to those available online through National College.

DSLs must ensure that all staff (including volunteers) complete the following mandatory training:

DSL

Course Title	Description	Duration	Frequency
Annual Certificate in Safeguarding for Safeguarding Leads	Designated safeguarding le	1hr 53 mins	Annually
Advanced Certificate in Online Safety for DSLs and DDSLs	Online risks represent one o	55 mins	Annually
Certificate in Safeguarding Children with Mental Health Needs	Safeguarding and mental h	50 mins	Annually
Certificate in Understanding child criminal and sexual exploitation	This child criminal and sex	1hr 10mins	Annually
Certificate in understanding child-on-child abuse and bullying	Gain the confidence to safe	38 mins	Annually
Certificate in the role of the DSL in Primary schools	Developed by Lorna Ponam	1 hr 48 mins	Upon induction
Top-Up Certificate in AI Safeguarding for DSLs	The Education Secretary ha	55 mins	Annually

Whole staff

Course Title	Description	Duration	Frequency	
Certificate in Data Protection & GDPR for Staff	Developed by Gary Henderson, an experienced director of IT who has w	26min	Annually	
Certificate in Allergy & Anaphylaxis Awareness	Developed in conjunction with the nationwide charity Anaphylaxis UK, i	141min	Annually	
Certificate in Epilepsy Awareness	This Essential CPD epilepsy training course for education settings provi	8min	Annually	
Annual Certificate in Safeguarding Refresher	KCSIE 2025 becomes statutory from September 2025, and our Annual i	52 min	Annually	
Certificate in the Prevent Duty	Ensure your setting remains compliant and vigilant with this essential P	1hr 13m	Every 2 years	
Certificate in Understanding Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a hidden threat which affects thous	43min	Every 2 years	
Certificate in Asthma Awareness	It is vital for staff to have an awareness of the impacts of asthma on the	19 min	Every 2 years	
Certificate in the Use of Restrictive Interventions	Ensure you are confident, safe and compliant when using restrictive int	49 mins	Annually	
Certificate in Online Safety for Teaching Staff *	Empower your entire staff team to keep children safe online with confid	50min	Annually	* Choose the course which applies to your role
Certificate in Online Safety for Support Staff *	Empower yourself to keep children and young people safe in an ever-ch	45min	Annually	



Appendix 6

School Local Information

School	Headteacher	DSL	DDSL	Chair of Governors	Safeguarding Governor	LA	CSC Contact	LADO	Link to the LA Policy