

Safeguarding policies – September 2018

Tudor Park Education Trust oversees the following policies but the local governing body of each academy or school within the Trust is responsible for the implementation of the policies.

The Board of Directors approved the Safeguarding policies in their meeting on 22 September 2018.

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Each school within the MAT has their own Behaviour Policy and Anti Bullying Policy.

Safeguarding and Child Protection Policy

Springwest Academy



Safeguarding and Child Protection Lead:
Safeguarding and Child Protection Deputy:
Prevent Leads:
Safeguarding Governor:

Hazel Hughes
Mariella Wilson
Hazel Hughes and Mariella Wilson
Daniela Lawson

Logic Studio School



Safeguarding and Child Protection Lead:
Safeguarding and Child Protection Deputy:
Prevent Leads:
Safeguarding Governor:

Hazel Hughes
John Cadogan
Hazel Hughes and John Cadogan
Simon Cooper

SAFEGUARDING CHILDREN	
<ul style="list-style-type: none"> • CHILD PROTECTION • CHILD SEXUAL EXPLOITATION • RADICALISATION • FGM • YOUTH PRODUCED SEXUAL IMAGERY • ALLEGATIONS OF PEER ON PEER ABUSE • CHILDREN MISSING EDUCATION 	
Person(s) Responsible:	Principal
Status:	Statutory
Date last approved:	22 September 2018
Date of next review:	Board of Directors September 2019
Review period:	Annually

This policy should be read alongside the following policies:

- The school's Behaviour Policy
- The school's Anti-Bullying Policy
- The Trust's Staff Code of Conduct
- The Trust's Allegations of Abuse Against Staff Policy
- The Trust's Safer Recruitment Policy
- The Trust's Visiting Speakers Policy
- The Trust's Whistle Blowing Policy

This policy has been drawn up as a response to:

DFE guidance 'Keeping Children Safe in Education' - September 2018, 'Working Together' – July 2018, Counter-Terrorism and Security Act - July 2015, Prevent and Channel duty guidance - June 2015, IRSC's Document 'Guidance for Safe Working Practice for the Protection of Children & Staff in Education Settings.', The Children Act 1989 defines a child as anyone who has not reached their 18th birthday

INTRODUCTION

Our policy applies to all staff, governors and volunteers working in the school. Safeguarding young people is the legal responsibility of us all. Tudor Park Education Trust is determined to ensure that all necessary steps are taken to protect the young people in our community. We are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them.

We will always act in the best interest of the child.

At Tudor Park Education Trust students are taught about safeguarding, including online, through various teaching and learning opportunities offered as part of a broad and balanced curriculum.

The overarching aims of this Policy are:

- to provide the safest possible environment for young people to enjoy their learning and develop safe practices
- to create a culture which recognises and understands the importance of safeguarding; including listening to and discussing with young people
- to ensure that young people who are suffering or likely to suffer significant harm are identified and appropriate action is taken to make sure they are kept safe.
- to prevent unsuitable people from working with our young people
- to ensure that safe practice is rigorously promoted and any poor practice is investigated and challenged
- to identify instances in which there are grounds for concern about a child's welfare and initiating or taking appropriate actions to keep them safe
- to contribute to effective partnership working between all those involved with providing safeguarding services for young people

Tudor Park Education Trust will ensure that:

- The welfare of the child remains paramount
- All our students, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to be protected from harm.
- All our students will be taught about Safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- **All** staff (paid or unpaid) have a duty to keep students safe and to protect them from physical and emotional harm.
- All staff have a duty to report **without delay** any concerns about a person's safety to Hazel Hughes who is the designated person for child protection or the deputy designated person for child protection. Staff also have a duty to take care of themselves. (Health & Safety At Work Act 1974).

- Where no specific guidance exists, staff make professional judgements about their behaviour in order to secure the best interests and welfare of students and, in so doing, will be deemed to be acting **REASONABLY**.

Safeguarding and promoting the welfare of all young people in our community

Confidentiality

- We recognise that all matters relating to child protection are confidential.
- The Director of Safeguarding named as Safeguarding and Child Protection Lead and/or the Principal will disclose any information about a student to other members of staff on a need to know basis only.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard young people.
- All staff must be aware that they **cannot promise a child to keep secrets**.

Supporting Children

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self worth. They may feel helplessness, humiliation and some sense of blame. School may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The School will endeavour to support the student through;

- The content of the curriculum;
- The school ethos which promotes a positive, supportive and secure environment and gives students a sense of being valued;
- Personalised learning provision;
- The school behaviour policy which is aimed at supporting vulnerable students in the school. The school will ensure that the student knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred;
- Liaison with other agencies that support the student such as Children's Services, Child and Adolescent Mental Health Service (CAMHS), education welfare service and educational psychology service and those agencies involved in the safeguarding of children;
- Notifying Children's Social Care immediately there is a significant concern;
- Providing continuing support to a student about whom there have been concerns who leaves the school by ensuring that appropriate information is forwarded under confidential cover to the student's new school.

Child Protection Policy and Procedures

All staff should be alert to the signs of abuse and neglect and know to whom they should report concerns or suspicions.

This policy is to be read in conjunction with the general duty – section 175 of the Education Act 2002

The School follows the London Child Protection Procedures 5th edition 2017 updated May 2018.

The policy outlines those procedures for this School.

As part of this Policy the School will

- ensure that it has a designated senior person for child protection who has received appropriate training and support for the role
- ensure that there is a nominated governor responsible for child protection
- ensure every member of staff and governor knows the name of the designated senior person for child protection and their role

Definition

The term 'abuse' is intended to include any situation where there is grave concern regarding the well-being of a student, including neglect as well as physical, sexual and emotional abuse. All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Someone 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 an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate off line abuse. They may be abused by an adult or adults or by another child or children.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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 (including via the internet). Sexual abuse can take

place online, and technology can facilitate off line 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 (see Peer on Peer abuse).

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

Please see the Appendix for the flow chart for raising safeguarding concerns about a child.

School's Responsibility

It is part of the School's responsibility of care to be alert to signs of abuse. This may include:

- sudden changes in behaviour
- withdrawal from social relationships
- sudden change in attendance patterns and other causes of concern about
- change in attendance
- change in working patterns
- loss of concentration
- lack of homework
- lack of motivation
- tearfulness, listlessness
- physical bruising

Children with special educational needs or disabilities

Children with special educational needs and disabilities can face additional safeguarding challenges.

- It is important not to make assumptions that that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability.
- Children with SEN and disabilities are disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- They may find communicating their worries difficult and these barriers need to be considered.
- At Tudor Park Education Trust we identify students who might need more support to be kept safe or to keep themselves safe through the work of the SEND teams, tailored safeguarding programmes and the provision of key workers/personal coaches.

Procedures

Staff should be receptive to any attempt a student may make to report that s/he, or another student is being or has been abused.

- They should also be observant.
- All concerns should be discussed with the DSL.
- If someone discloses to you that they are being abused either physically, emotionally or sexually you should:

- React calmly
 - Reassure the child that they were right to tell and that they are not to blame and take what the child say seriously.
 - Be careful not to be deemed as putting words into their mouths. It is better not to ask questions – leave that to the child protection team.
 - REMEMBER not to promise confidentiality right from the beginning. You should advise the child that you will have to pass information on if there is any suggestion of harm to themselves or somebody else.
 - Inform the child what you will do next
 - Do not delay in passing on the information. This may be verbally initially, but a full and written record of what has been said must be made as soon as possible and passed to the DSL.
- All suspicious observations of staff should be immediately reported to the Designated Person Responsible for Child Protection - Hazel Hughes (SA), John Cadogan (LSS) or in their absence to the Principal.
 - The Designated Person for Child Protection will, if student does not dispel suspicions, refer the student to the Child Protection Team. **It is not our responsibility to decide whether abuse has taken place or not, however it is our responsibility to pass on any concerns to the appropriate authority immediately.**
 - The Designated Person for Child Protection will inform the parents or guardians, if appropriate, and record responses, statements and observations in connection with the alleged abuse.
 - The Education Welfare Officer will also be informed.
 - Staff, if appropriate, will be informed of the need to monitor a student in his/her tutor group.
 - Emergency action – In some cases you may need to protect a child immediately – in these situations dial 999. The police are the only agency with statutory powers for the immediate protection of children.
 - The London Child Protection Procedure Handbook is available in the SENDCO's office (SA) and the Principal's office (LSS).

Monitoring

The Achievement Co-ordinator or Head of Year for each year group will keep an 'at risk register' for students in their year and with the help of the Form Tutor will monitor the progress and well-being of the student within the school. They will discuss students "at risk" regularly during line management meetings with the member of SLT responsible for the year.

Staff may be asked to attend case conferences.

The designated Teacher for Child Protection will hold a whole school register of students "at risk" and students will be discussed at Student in Need Meetings as appropriate to assist the monitoring of their well-being.

Staff Issues

Staff involved cannot promise confidentiality and a student should always be warned that the information will need to be shared with the Designated Teacher for Child Protection.

Although staff will feel considerable sympathy for students when disclosing sensitive information, it is inadvisable to touch a student at any time.

Staff will receive training during their Induction programme and will undertake annual formal training to provide relevant skills and knowledge to safeguard children effectively, through an online training programme, alongside regular training throughout the year.

Supporting Staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the Child Protection Officer and to seek further support as appropriate

Responsibilities

Staff must report to a member of the Senior Leadership Team any behaviour by colleagues that gives cause for concern in relation to safeguarding the wellbeing of students.

If any incident occurs which may result in an action being misinterpreted and / or an allegation being made against a member of staff, then the relevant information should be recorded promptly and reported to senior staff. See separate safeguarding policy 'Allegations against Staff'.

Parents

Parents will be informed of the College Policy via the website and hard copies will be available on request from the Principal's PA or your child's Pastoral Mentor.

Children Missing from Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when students are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the contact numbers change.

In response to the guidance in Keeping Children Safe in Education (2018) the Trust has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions)
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage
4. Procedures to inform the local authority when we plan to take students off-roll when they:
 - a. Leave school to be home educated
 - b. Move away from the school's location
 - c. Remain medically unfit beyond compulsory school age
 - d. Are in custody for four months or more (and will not return to school afterwards) or

- e. Are permanently excluded.

We will ensure that students who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a student leaves the school, we will record the name of the pupil's new school and their expected start date.

The Safeguarding Lead will consider further actions / support should it be required. Should a student go missing from school (education) the Attendance Officer will inform the Safeguarding Lead. Hazel Hughes or John Cadogan and CME Officer at the LA with all relevant information regarding the child. A child will not be deleted from the school register until the new school is aware or a referral has been acknowledged and advice to remove agreed with the LA. See further guidance *Children Missing Education September 2016*.

Private fostering

A private fostering arrangement is where a child under the age of 16 (or 18 if disabled) is provided care and accommodation by someone to whom they are not related in that person's home. It is made privately (without the involvement of the LA), with the intention that it should last for 28 days or more.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

If a member of staff becomes aware of this arrangement for students they should inform the DSL (Hazel Hughes or John Cadogan).

The DSL will inform the LA to check they are aware of the arrangement.

Child Sexual Exploitation Policy

Child sexual exploitation [CSE] is child sexual abuse and child protection procedures should be followed when there are concerns that a child is at risk of CSE or is already the victim of CSE.

Child sexual exploitation [CSE] is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;

- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Grooming

Sexual exploitation is commonly characterised by the grooming of young people. This process is carried out by perpetrators to gain their trust. Perpetrators often target children who are already vulnerable – who may have troubled family histories and/or be bullied outside of the home and socially isolated. Once the young people are thought to be sufficiently emotionally involved, violence and intimidation is often used to ensure compliance. In addition, perpetrators may give drugs and alcohol to victims and encourage addiction in order to ensure they become dependent on them for the supply of these substances.

Vulnerability

Sexually exploited children come from a range of backgrounds and may have no additional risk factors or vulnerabilities, therefore, professionals should always keep an open mind to the possibility that a child may be at risk of exploitation. However, children can be at increased risk of sexual exploitation if they have any additional vulnerabilities, as perpetrators may target them and try to exploit these vulnerabilities. The following are examples of factors that can make a young person more vulnerable to exploitation:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality).
- A history of abuse (including familial child sexual abuse, physical and emotional abuse and neglect).
- Having a physical or learning disability.
- Learning disabilities.
- Bereavement or loss.
- Being lesbian, gay, bisexual or transgender.
- Boys and girls whose gender identity differs from the sex they were given at birth or who question their gender identity [someone who is or feels they may be trans or trans-gender]
- Having temporary leave to remain or being in the UK illegally.
- There are indications that the child has been trafficked into the UK.
- Homelessness, including living in a hostel, bed and breakfast accommodation or a foyer.
- Being a young carer.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Living in residential care.
- Lacking friends from the same age group.
- Having low self-esteem or self-confidence.
- Social isolation or social difficulties

- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work.

Never giving up on a child

The provision of consistent, non-judgemental support will give more confidence to victims to disclose and give evidence. Victims talk about the importance of having a professional who listened and showed that they cared. Students at Tudor Park Education Trust have very trusting and important relationships with staff who are there to support them. There is an ethos and culture of listening to our students

Disclosure

It is important to be aware that children might disclose indirectly – it is quite common for children to say that the abuse is happening to a friend or someone they know when in fact it is they themselves who are being abused.

If you have any concerns, however vague, you should alert the Safeguarding and Child Protection Lead – Hazel Hughes or in her absence the Deputy Designated Safeguarding Lead.

Female Genital Mutilation (FGM) Policy and Procedure

Female Genital Mutilations is child abuse and is illegal. It is the personal duty of staff who identifies FGM or receives a disclosure to make a crime report to the police.

If a staff member has either been told by a girl that she has had FGM or has observed a physical sign appearing to show that a girl has had FGM, s/he should personally report the matter to the police by calling 101.

If the girl informs you she is at imminent risk or has been recently cut, you should take immediate action which may include calling 999.

If a parent /carer disclose that a girl has had FGM or if you consider the girls to be at risk of FGM take immediate advice from the Safeguarding Lead (Hazel Hughes or John Cadogan) or the Principal.

If you in are ever in any doubt about any form of abuse always ask the Safeguarding Lead.

Information on FGM

FGM involves cutting, and sometimes sewing the girl's genitalia, normally without anaesthetic, and can take place at any time from birth onwards. It is sometimes referred to as 'female circumcision' but this misnomer belies the invasive and irreversible nature of the procedure. It is now more correctly termed female genital mutilation.

The procedure has a cultural, rather than religious, origin and is practised by disparate ethnic communities in many countries, including Ethiopia, Somalia, Sudan, Egypt, Nigeria, India, Pakistan, Yemen and Iraq.

The Female Genital Mutilation Act 2003 makes it a criminal offence, not only to carry out FGM in England, Scotland and Wales on a girl who is a UK national or permanent resident, but also to take a girl out of the UK to have FGM performed abroad, even to countries where FGM is legal.

The indicators of FGM may initially mirror those of sexual abuse. You may notice, for example, that a girl or young woman shows signs of pain or discomfort, needs to visit the toilet constantly, has vaginal blood loss or is unable to sit comfortably. She may make excuses to avoid PE and other physical activity or refuse to use the school showers. She may also become evasive or fearful if you enquire if she is unwell, and assure you that she is fine when she is clearly not. If she is a BME child, has recently arrived back from a 'holiday' abroad or a period of absence from school, seems to be in pain and has not been taken by her family to see a doctor, you should consider FGM, alongside other possible explanations.

Forced marriage

Forced marriage occurs when a young person is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse. It is very different from an arranged marriage, where both young people can make the decision to accept or decline the partner chosen for them by their parents.

Once again, schools can be seen to be in the front line in protecting young people from this type of abuse. A student who fears that they are likely to be forced into a marriage may disclose to a member of staff. Their initial approach, in common with many disclosures of abuse, may be seemingly innocuous, such as talking about taking a holiday abroad. Their fear that the proposed holiday will result in a forced marriage may only become apparent after a number of conversations.

These young women may also become victims of what is termed honour-based violence. This type of violence is described in 'The Right to Choose' guidance as: 'A variety of crimes of violence (mainly but not exclusively against women), including assault, imprisonment and murder where the person is being punished by their family or their community'.

So-called 'honour based' violence

So-called honour based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead (Hazel Hughes or John Cadogan). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HPV, or already having suffered HBV.

Actions

If staff have a concern regarding a child that might be at risk of HBV, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see FGM section).

Extremism/ Radicalisation / PREVENT Policy and Procedure

Definition of extremism

The government has defined extremism as: Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

The Prevent strategy

Terrorist groups seek to radicalise and recruit people to their cause. The aim of Prevent is to stop people becoming or supporting terrorists by challenging the spread of terrorist ideology, supporting vulnerable individuals, and working in key sectors and institutions.

The Prevent Strategy sets out the following responsibilities for staff. They should:

- Understand what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it.
- Be aware of what the government means by the term 'extremism' and the relationship between extremism and terrorism.
- Know what measures are available to prevent people from becoming drawn into terrorism and how to challenge the extremist ideology that can be associated with it.
- Understand how to obtain support for people who may be being exploited by radicalising influences.

The school is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs. We actively challenge prejudice, and discrimination. We do not tolerate the expression or promotion of extremist views of any kind from any member of the school community (students, staff, parents/carers or governors), or from external the external community, such as external agencies or visitors to the school.

We recognise that extremism and exposure to extremist materials and influences can lead to poor educational outcomes and life chances and can involve serious risks for young people. Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the life chances of young people. We therefore address such issues as a safeguarding concern as set out in this policy. If we fail to challenge extremist views we are failing to protect our students.

Our Approach

We aim to protect our students from being vulnerable to extremist views and radicalisation by:

- Building a cohesive community. The ethos of Tudor Park Education Trust is one of mutual respect and consideration. Our ethos and curriculum promotes respect, tolerance and diversity.
- Equipping young people with the knowledge, skills to challenge and debate in an informed way. Through our focus on developing speaking and listening students are encouraged to share their views in a respectful, considered way.
- Encouraging students to be inquisitive, explore their identities and express their views through our Culture and Society Programmes. Teachers provide a safe space for students to be able to take place in discussions which may include controversial issues.

- Valuing and promoting diversity and equal opportunities. We encourage students to understand and show empathy for others. We aim to ensure that students feel a sense of belonging in a community and wider society in which the diversity of people's backgrounds and circumstances is appreciated and valued in which strong and positive relationships.
- Supporting students' character development through our Learner Skills in order to develop resilience – independence, inquisitiveness, reflection and collaboration. Our core values underpin all that we do: courage and determination, excellence and inspiration, friendship and equality.
- Ensuring that students are taught in a way that is consistent with the UK law and the British values of tolerance, democracy and liberty. We take extremely seriously our key role in preparing all our young people for life in modern Britain and the wider world. We promote awareness of human rights and the responsibility to uphold and defend them, to develop the skills of participation and responsible action.
- Enabling students to explore issues like terrorism and the use of violence in a considered and informed way, facilitating understanding of wider issues within the context of learning about the values on which our society is founded and our system of democratic government. Students see the school as a safe place where they can explore controversial issues safely.
- Making it clear that violent extremism is not part of any faith. Our RE and Cultural Studies curriculum prepares students to live and work in a diverse society. It supports students in gaining knowledge and understanding of a range of religious beliefs and encourages them to understand and respect the cultures, faith and backgrounds of others.
- Ensuring that staff have an awareness of students' circumstances and backgrounds, including an understanding of the local context.
- Training staff to identify children who are at risk and to know where and how to refer children at risk. Assessing whether any students are at risk of being drawn into terrorism.
- Checking that visiting speakers are suitable (and seeing presentations ahead of time).
- Teaching students about E-safety, how to protect themselves online and having a robust E-Safety Policy.
- Protecting all students from harm through the implementation of a rigorous Safeguarding Policy.

Responsibilities of Staff

It is not the responsibility of staff to investigate concerns, disclosures or allegations of potential extremism or radicalisation. Staff have a duty to recognise concerns and maintain an open mind. Any concerns matter, concerns about extremist views or radicalisation should be recorded and reported immediately to the Prevent Leads Hazel Hughes or the Deputy DSLs, or in their absence, a member of SLT.

Where a student is thought to be vulnerable or at risk of significant harm, and/or where investigations need to be carried out, the Safeguarding Lead will make a referral to Channel. Social services may also be contacted in line with the School's Child Protection Policy.

If a staff member becomes aware that a parent/carer or visitors to the Academy has expressed extremist views, he/she must report it immediately to the Prevent Lead.

At the point of referral, agencies such as PREVENT (part of the government's counter-terrorism strategy) may become involved.

Procedures

Procedures to follow if a member of staff has concerns about a student being vulnerable to extremist views/radicalisation:

The member of staff should:

- a) Write up an objective account of the concern. Any notes taken should be kept safe and confidential
- b) Contact the Prevent Lead
- c) Pass your written notes to the Prevent Lead
- d) Maintain confidentiality and do not discuss the issue further with other members of staff or outside of the Academy

The Prevent Lead will make a referral to Channel and/or contact and take advice from the Prevent Officer for Hounslow, depending on the level of concern.

If there concerns about imminent danger to life then 999 should be called.

Channel Referral

Email the Prevent Engagement Officer Angela Rusby PC 165so

Email: angela.rusby@met.pnn.police.uk putting Channel Referral as the subject

Angela's mobile 07769 934659

The Counter Terrorism Officer is Gary McGinn Constable

Email: gary.McGinn@met.pnn.police.uk

Gary's mobile 07879 493035

Local Authority Prevent Lead: Mrs Joan Conlon

Email: joan.conlan-GCSX@hounslow.gscx.gov.uk

Joan's mobile 07817 079190

Complaints or concerns expressed by students, parents, staff or volunteers

We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the school will take but also the length of time that will be required to resolve the complaint. The school will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint.

Child criminal exploitation – county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs or money from urban areas to suburban and rural areas. This abuse is typified by some form of power imbalance in favour of those perpetrating the exploitation and may involve age, gender, cognitive ability, physical strength, status or access to economic or other resources.

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Youth produced sexual imagery (sexting)

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly.

In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to the designated safeguarding lead who will refer on to police and/or children's social care.

If they have any doubts about whether to involve other agencies, they will make a referral to the police.

Assessing the risks

The Designated Safeguarding Lead with the help of pastoral mentor, personal coach or year leader will conduct a review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

Why was the imagery shared?

Was the young person coerced or put under pressure to produce the imagery?

Who has shared the imagery?

Where has the imagery been shared?

Was it shared and received with the knowledge of the pupil in the imagery?

Are there any adults involved in the sharing of imagery?

What is the impact on the pupils involved?

Do the pupils involved have additional vulnerabilities?

Does the young person understand consent?

Has the young person taken part in this kind of activity before?

The DSL will always use their professional judgement along with their colleagues to assess the risk.

Informing parents (or carers)

Parents (or carers) will be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm.

Reporting incidents to the police

If it is necessary to refer to the police, contact our safer schools officer or dial 101. Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Securing and handing over devices to the police

If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

Searching devices, viewing and deleting imagery

Viewing the imagery

Adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so.

Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the student.

If it is necessary to view the imagery then the DSL should:

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Principal.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Principal.
- Ensure viewing takes place with another member of staff present in the room, ideally the Principal or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Principal or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated.

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role the DSL should complete a safeguarding viewing form explaining how the image/s happened to be viewed.

Deletion of images

If it has been decided that other agencies do not need to be involved, then it is recommended that imagery is deleted from devices and online services to limit any further sharing of the imagery.

This policy gives the school the power to search students for devices, search data on devices and delete youth produced sexual imagery.

However, it is not recommended that school staff view imagery, it is recommended that schools should not search through devices and delete imagery unless there is good and clear reason to do so. It is recommended that in most cases young people are asked to delete imagery and to confirm that they have deleted the imagery. The student/s should be given a deadline for deletion across all devices, online storage or social media sites.

Students should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed.

Preventative measures

There is a strict mobile phone policy in place banning the use of student mobile devices during the school day. Where devices are seen to be used they are confiscated and not returned until the end of the day and a conversation is held with the parents, and only returned in accordance with the policy.

An allegation of child abuse made against another student or students (Peer on Peer Abuse)

(This policy should be read alongside the Anti-Bullying Policy)

Children and young people may be harmful to one another in a number of ways which would be classified as peer on peer abuse. The purpose of this policy is to explore the many forms of peer on peer abuse and include a planned and supportive response to the issues.

Abusive behaviour can happen to pupils in schools.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence

Types of abuse:

There are many forms of abuse that may occur between peers and this list is not exhaustive.

Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

Bullying (physical, name calling, homophobic etc.)

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

- An Imbalance of Power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

Cyber bullying

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone for the same reasons as stated above.

Sexting

Sexting is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference.

Initiation/Hazing

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

Many rituals involve humiliation, embarrassment, abuse, and harassment.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Teenage relationship abuse

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

Expected action to be taken by all staff:

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

In all cases of peer on peer abuse it is necessary that staff dealing with such incidents, talk to the young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

1. Gather the Facts

Speak to all the young people involved separately, gain a statement of facts from them and use **consistent language** and **open questions** for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)

- **What is the age of the children involved?**

How old are the young people involved in the incident and is there any age difference between those involved?

- **Where did the incident or incidents take place?**

Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

- **What was the explanation by all children involved of what occurred?**

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

- **What is each of the children's own understanding of what occurred?**

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from the Designated Child Protection Officer.

Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

2. Consider the Intent (begin to Risk Assess)

Has this been a deliberate or contrived situation for a young person to be able to harm another?

3. Decide on your next course of action

If from the information that you gather you believe any young person to be at risk of significant harm you must make a safeguarding referral immediately (where a crime has been committed the police should be involved also).

If social care and the police intend to pursue this further they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take.

It may also be that social care feel that it does not meet their criteria in which case safeguarding lead may challenge that decision, with that individual or their line manager. If on discussion however, the safeguarding lead agrees with the decision, you may then be left to inform parents.

Informing parents

If, once appropriate advice has been sought from police/social care you have agreement to inform parents or have been allocated that role from the other services involved then you need to inform the parents as soon as possible. If services are not going to be involved then equally, this information may need to be shared with parents. If a young person is deemed to be 'Gillick Competent' following the 'Fraser' guidelines and does not wish you to share the information with parents, then the school must consider this especially for example if the young person is pregnant and this is why they are being bullied (unless this has occurred through significant harm in which case a criminal/social care case is likely or the young person is under the age of 13).

In all circumstances where the risk of harm to the child is evident then you will encourage the young person to share the information with their parent or even with them (they may be scared to tell parents that they are being harmed in any way). Where the school can evidence they are acting in the best interests of the young person they would not be criticised, however this would be the case if they actively breached the rights and choices of the young person.

The best way to inform parents is face to face.

Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the young person who has been harmed

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer

groups/relationships with other young people or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PHSE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the young person who has displayed harmful behaviour

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a punishment as a consequence such as exclusion or internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

After care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative

Preventative Strategies

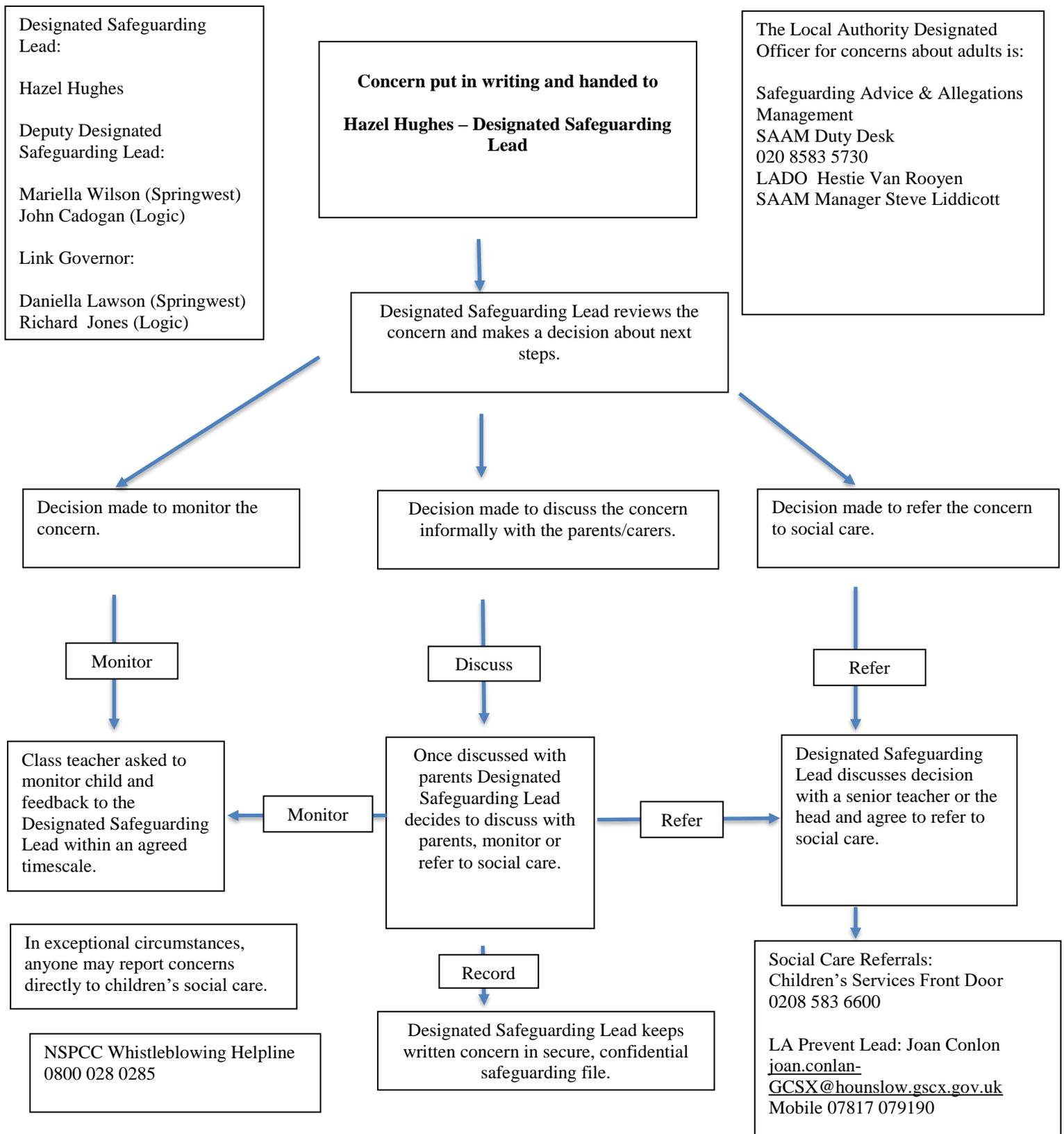
Firstly, and most importantly is recognition that peer on peer abuse can and will occur even with the most stringent of policies and support mechanisms. In which case it is important to continue to recognise

and manage such risks and learn how to improve and move forward with strategies in supporting young people to talk about any issues and through sharing information with all staff.

The school has an open and supportive ethos where young people feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive PHSE/SMSC curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another.

To enable such an open and honest environment it is necessary to ensure that every member of staff feels confident and enabled to talk about issues and challenge perceptions of young people including use of inappropriate language and behaviour towards one another. **It is incredibly important that staff do not dismiss issues as 'banter' or 'growing up' or compare them to their own experiences of childhood. It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a young person seeking no further help or advice.**

**APPENDIX: FLOW CHART FOR RAISING SAFEGUARDING CONCERNS
ABOUT A CHILD**



TUDOR PARK EDUCATION TRUST	Staff Code of Conduct A Safeguarding Document
Person(s) responsible for updating the policy:	Chief Executive Officer
Date last approved:	22 September 2018 (Board of Directors)
Date of next review:	Autumn Term 2019
Review period:	Annually
Status:	Non Statutory

Tudor Park Education Trust oversees this policy but the local governing body of each academy or school within the Trust is responsible for the implementation of the policy.

Introduction

This Code of Conduct covers behaviour by staff towards students and colleagues, as well as financial probity. The first part is concerning students' welfare and the second part is concerning standards of behaviour towards staff.

The welfare of our students is paramount. Staff should understand their responsibilities to safeguard and promote the welfare of students. Staff are responsible for their own actions and behaviours and must avoid any conduct which would lead any reasonable person to question their motivation.

Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded. Staff should discuss with their line manager if they have acted in a way which may give rise to concern. Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation. Staff should not consume alcohol or any substance include prescribed medication, which may affect their ability to care for students.

Staff must be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action and/or other proceedings including the Disclosure and Barring Service (DBS) form working in regulated activity, or for acts of serious misconduct prohibition from teaching by the National College of Teaching and Leadership (NCTL).

Staff must be aware of and understand the Safeguarding and Child Protection Policy, Allegations against Staff and allegations by a student against another child/children, Behaviour Policy, Whistle Blowing Policy and Hounslow Safeguarding Children Board procedures.

Responsibilities regarding students

All staff have responsibility to keep students safe and protect them from abuse (sexual, physical and emotional), neglect and safeguarding concerns. Students have the right to be treated with respect and dignity. Trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.

In making professional judgements Staff should always consider whether their actions are warranted, proportionate, safe and applied equitably.

Positions of Power and Trust:

- Don't use your position to gain access to information for your own advantage or to a student's or family's detriment.
- Do not use your position of trust to take advantage of a student in any way
- Don't use your power to intimidate, threaten, coerce or undermine students.
- Don't engage in sexual activity with any student, **6th Form included**, or cause or invite a student to engage in or watch any kind of sexual activity. Their consent is irrelevant. The Sexual Offences Act 2003 makes it clear that it is a criminal offence for a person aged 18 or over (eg teacher) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children aged under 18 in the same establishment as the child, even if s/he does not teach the child.
- Be aware how your action may be viewed by others. Do not be seen to be paying special attention to a particular student. Always ask yourself, 'Are my actions fair, reasonable, warranted, proportionate, measured, safe and applied equitably?'

Propriety and Sexual Conduct

- Don't behave in such a manner that would lead any reasonable person to question your suitability to work with children or to act as a role model. This can also include out of school activities. Ref: Teacher Standards 2012.
- Do not have any form of sexual contact with a student from the school.
- Don't make sexual remarks to a student (including e-mail, text messages, Social Networks, phone and letter), or behave in any way, which could be interpreted as sexually suggestive or provocative.
- Do not make sexual remarks to or about a student
- Don't discuss your own sexual preferences or sexual relationships with or in the presence of students.
- Don't discuss a student's individual sexual relationships in full class or in other inappropriate contexts or settings.
- Don't make unprofessional personal comments that scapegoat, demean or humiliate students.

Infatuations

Report immediately to a senior member of staff any indications (verbal, written or physical) that suggest a student may be infatuated with you, or with a colleague. Always maintain professional boundaries.

Dress

A person's dress & appearance are a matter of personal choice and self-expression. However, staff should consider the manner of dress and appearance appropriate to their professional role. This may be different from that adopted in their personal life.

Staff should dress professionally, decently, safely and appropriately. Your dress should not be viewed as offensive, revealing or sexually provocative. It should not distract, cause embarrassment or give rise to misunderstanding. It should be absent of any political or otherwise contentious slogans and should not be deemed as discriminatory.

Gifts, rewards, favouritism and exclusion

- Be aware of and understand the behaviour policy
- Don't accept any gift that might be construed by others as a bribe, or lead the giver to expect preferential treatment.
- Small 'thank you's' are OK, but don't receive gifts on a regular basis or of any significant value. Refer to SLT if this is happening.
- Generally only give gifts to a student as part of our agreed reward systems.
- In any other context, ensure that any gifts given are of insignificant value and given to all children equally (e.g. chocolate bars to all in an end of term tutor period).

Social Contact outside of the workplace

- Always approve any planned social contact with pupils or parents with a Senior Leader, for example when it is part of a reward scheme.
- Advise a Senior Leader of any regular social contact you have with a student which could give rise to concern.
- Refrain from sending personal communication to students or parents unless agreed with senior managers
- Inform Senior Leaders of any requests or arrangements where parents wish to use your services outside of the workplace eg babysitting, tutoring

Communication with students including Social Media

- Don't try to establish social contact with students for friendships or a relationship either physically or on the internet eg Facebook, Instagram, Whatsapp or any other application.
- Don't give personal details to students, e.g. home / mobile phone numbers, home e-mail address, unless checked with and agreed by senior staff. Ref e-Safety Policy.
- Any contact with parents or students by e-mail must be by **your school e-mail**.
- Any telephone contact with parents or students must be by using school telephone system or work mobile phones.
- Any unwelcome communications to staff, be they written or visual, from students or parents should be reported immediately.

Physical Contact

- As a general rule, do not touch students –**see Behaviour Policy for appropriate contact**
- Physical contact should never be secretive or for personal gratification or of a type which may be considered indecent.
- There are occasions when it is appropriate and proper for staff to have physical contact with students, but you should **only** touch when it is appropriate and proper to do so in your professional judgement. Physical contact should be in response to a child's needs at the time, of limited duration, and appropriate given their age, stage of development, gender, ethnicity and background.
- Some staff (e.g. PE, Technology, Music, Drama & SEN staff) may need to initiate physical contact, e.g. in order to support a child so they can perform a task safely, to demonstrate a particular piece of equipment / instrument or assist them with an exercise. This should be done with the student's understanding of the reason and their consent, and in an 'open' environment.
- Don't indulge in horseplay, tickling or fun fights.
- Use extra caution when it is known that a student has suffered previous abuse or neglect.
- Be aware of cultural or religious views about touching and be sensitive to issues of gender.
- Report immediately any physical contact which concerns you or which you believe may have been misconstrued.

Intimate / personal care

- Physical contact that occurs regularly with an individual child or young person, e.g. with physical or medical needs should follow the agreed plan and be subject to review. Where feasible, staff should seek the child's permission before initiating contact and explain what is happening before a care procedure begins. Staff should listen, observe and take note of the child's reaction and/or feelings and, so far as is possible, use a level of contact that is acceptable to the child and for the minimum time necessary.

Showers and Changing

- Don't touch a student in a state of undress. (see comments above relating to physically disabled students)
- Re changing rooms, students are of course entitled to privacy and therefore –
 - Announce your intention of entering.
 - Avoid visually intrusive behaviour.
 - Don't remain there unless student needs require it.
 - Don't change or shower in the same place.
- Be particularly careful about gender issues.

One to One Situations

- Avoid meeting in remote, secluded areas of the College.
- Ensure there is visual access and / or an open door wherever possible.
- Try to ensure that there are other staff around or at least aware of the meeting.

- Don't use 'engaged' or equivalent signs.
- If you have reason to be concerned about a one to one meeting in advance, because of a student's previous behaviour or vulnerability, arrange for a colleague to be present, especially where there is a gender difference.
- Don't pre-arrange meetings with students away from the school premises, except (exceptionally) with the approval of the parent and the Principal.

Home visits

- Always agree the purpose of any home visit with your line manager
- Adhere to agreed risk management strategies, other than in an emergency never enter a home if the parent/carer is absent
- Avoid unannounced visits wherever possible
- Ensure there is visual access and/or open door in one to one situations
- Always make detailed records including time of arrival and time of departure and discuss any concerns with your line manager

Overnight Supervision during Exam Periods

- This should never be undertaken without prior arrangement with the exam board and with senior staff.
- Only staff **volunteers** would be used and they would be fully briefed about appropriate and safe practice (see Section 20 of IRSC).

Transporting Students

- You should not transport students in your own vehicle, especially one to one, without the consent of the student, parent and a senior manager.
- You must always have a valid licence and business insurance for this purpose. Your vehicle must be roadworthy and you must be fit to drive. All passengers must wear seatbelts.
- Wherever possible it is advisable to take an additional adult. You must be aware that the safety and welfare of the students /s is your responsibility until this is safely passed over to the parent/carer.
- You should report the nature of the journey, the route and expected time of arrival to your line manager and parent/carer
- Never transport a student to hospital in your own vehicle following an accident. Always call an ambulance.

Educational Visits and after College Activities

- Observe all aspects of the College policy on educational visits. (Refer to the Diary and Staff Handbook).

- Always have another adult present in out of College activities, unless otherwise agreed by a senior manager.
- Check with students that there is parental consent to the activity.
- Remember that in these less formal contexts you are still in a legal position of trust and need to ensure that your behaviour is professional at all times and cannot be interpreted as seeking to establish an inappropriate relationship or friendship.
- Never share beds or bedrooms on residential

First Aid and the Administration of Medicines

- No medicine should be given by staff without **written parental consent**. This includes aspirin, ibuprofen etc.
- Staff are not expected to administer or to supervise the taking of medicines unless specifically authorised and trained to do so.
- Students needing medication regularly should have a health care plan in place.
- Wherever possible, first aid should only be given by our trained staff and by staff of the same gender if possible. Try to ensure that another adult is present, or at least aware, when first aid is administered. In exceptional emergency circumstances it may be necessary for an untrained member of staff to intervene. If so, do the minimum required whilst awaiting specialist support.
- **Always report** any accident or first aid administration to the Medical Room Welfare Officer, as parents must be informed.
- A member of staff should **always** accompany a child taken to hospital by ambulance, and should stay until the parent arrives.

Curriculum

- Care should be taken that resource materials are appropriate and relate to the planned learning objectives.
- Sensitive issues (e.g. relating to sex, race, religion, gender, disability) should be handled with care, especially where unplanned discussion arises.
- Never undermine fundamental British values
- Ensure planned lessons and extra-curricular activities will be free from Partisan, political and religious view. Where political issues are discussed, a balanced view is always presented.
- Do not enter into or encourage inappropriate or offensive discussion about sexual activity.
- Remember that parents have a legal right to withdraw children from all or any part of sex education (but **not** from the biological aspects of human growth and reproduction integral to the science curriculum).
- Don't show visual material that is inappropriate for the age of the students concerned, taking special care over the use of videos and DVDs.

Photographic or Video Images

- It is very good practice at times to record photographic and video images of students, or to allow students to record such images of each other, e.g. to assist teaching and learning, to celebrate achievement, for publicity. It is advisable to use college equipment, not your own for this purpose. All images should be disposed of when no longer in use, including class photos lists.
- Because of the potential for images of children to be misused for pornographic or grooming purposes, staff should follow this policy –
 - Only record images when there is a justifiable need. Never store images on home equipment.
 - Avoid making images in one to one situations
 - Be clear to students about why the images are being recorded and what will happen to them.
 - Ensure that a more senior colleague is aware that you are recording images.
 - Ensure that all images recorded are available for scrutiny, in order to screen for acceptability.
 - Avoid making images in one to one situations.
 - Images of students should not be displayed on websites, in publications or in a public place without the consent of the student and parent / carer.
 - Existing parents are consulted to allow them to indicate that they do **not** wish their child to be photographed. Unless they so indicate, we will deem that it is acceptable to record images for legitimate purposes. In future, parents of new intakes / new admissions will routinely be asked to give such general consent.

You should NOT do the following:

- Take images of pupils for your personal use
- Take images of students using personal equipment
- Take images of a student in a state of undress or semi-undress
- Take images of a student which could be considered as indecent or sexual
 - 1) If a photo is used, **don't** name the student, unless you have direct parental consent.
 - 2) If a student is named, **don't** use the photo, unless you have direct parental consent.
 - 3) Where the college has decided that images should be retained for further use, they should be securely stored and used only by those authorised to do so.

Staff should report to SLT any concerns they have relating to adults or students taking inappropriate photos or making videos of students around the College or at College events.

Exposure to inappropriate images

- Staff must follow the College policy on the use of IT equipment and the Internet (see Staff Handbook).

- Accessing child pornography, or making, storing or disseminating such materials is illegal and, if proven, will lead to a bar from teaching / working with children.
- Staff must not use college IT equipment to access adult pornography, on or off site.
- Staff should ensure that any films or material shown to children are age appropriate

This section of the policy has been written to support staff and students by being as clear as possible about safe conduct. Inevitably, situations will arise that the Policy does not cover, and staff should feel free to seek further advice from the SLT in such circumstances

Honesty, integrity and financial probity

Staff must maintain the highest standards of honesty, integrity and financial probity. This includes the handling and claiming of money and the use of school property and facilities.

You must:

- Ensure that public funds are used in a responsible and lawful manner.
- Strive to ensure value for money and to avoid legal challenge to the Trust.
- Ensure compliance with the Academies Financial Handbook and the Trust's financial policies and procedures.
- Ensure compliance with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or other advantage to someone; or if they request, agree or accept, or receive a bribe from another person (please refer to the Trust's Gifts and Hospitality Policy).
- Never turn a blind eye to fraud or corruption. If you have any suspicions or concerns then you should raise them immediately through the Trust's Whistleblowing procedures.

Responsibilities regarding staff

The Trust seeks to promote a culture of fairness, ensuring that all staff respect each other and work in harmony to achieve the aims and goals of the organisation. The Trust expects the highest standards of behaviour from its staff and for all staff to be aware of how their behaviour can affect or impact on others. The Trust expects that members of staff will conduct themselves in a professional manner when interacting with or managing colleagues.

Everyone should be treated with dignity and respect at work. Bullying and harassment are unlawful and will not be tolerated in the workplace.

Harassment as defined in the Equality Act 2010 is:

Unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. Harassment is unlawful when it is related to one of the following: age, sex, disability, gender (including gender reassignment), marriage and civil partnership, pregnancy and maternity, race, religion/belief or sexual orientation.

Bullying may be characterised as:

Offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient.

Examples of bullying or harassing behaviour include:

- spreading malicious rumours
- unfair treatment
- picking on someone
- regularly undermining a competent worker
- denying someone's training or promotion opportunities

Bullying and harassment can happen face-to-face, by letter, by email or by phone.

Bullying and harassment can cause staff to feel anxious, humiliated, frightened and de-motivated. They could also feel stress, loss of self confidence and low morale which can lead to illness, absence from work and even resignation. Job performance is affected and relations in the workplace suffer.

Positive approach to dignity and respect

Staff, SLT and line managers must give attention to promoting positive behaviours in the way they manage the employees for whom they are responsible and setting appropriate standards of behaviour. Staff, SLT and line managers should lead by example in the way they manage including:

- Treating staff as individuals
- Recognising the contribution staff make in the school
- Ensuring staff have equality of opportunity, including CPD opportunities
- Respecting people's differences
- Allocating work fairly and with recognition of the pressures that exist in meeting challenging timescales
- Listening to any concerns expressed by staff and responded to them in a reasonable way
- Ensuring that performance management is undertaken equitably and that standards are set fairly.

Steps the Trust will take to prevent bullying and harassment

- Ensure staff know who they can turn to if they have a work-related problem
- Ensure that managers are trained in all aspects of the Trust's policies in this sensitive area

- Ensure that senior management and line managers set a good example through their behaviour towards all staff
- Ensure the Trust has a culture where staff are consulted and problems discussed
- Ensure that standards of behaviour are set. Ensure there is a clear statement that sets out the Trust's expectations about behaviour at work so that staff are clear that bullying and harassment are unacceptable
- Ensure there are fair procedures for dealing with any complaints, ie through clear grievance and disciplinary policies
- Ensure complaints are dealt with fairly, confidentially and sensitively.

If staff have got concerns about any of these issues they should raise them with an appropriate manager, the Head of HR or a trade union representative to see if they can sort out the problem informally first. If this is not possible, staff should make a formal complaint using the Trust's grievance procedure. Bullying and harassment may be treated as disciplinary offences.

TUDOR PARK EDUCATION TRUST	Allegations Against Staff & Volunteers Policy
Person(s) responsible for updating the policy:	Chief Executive Officer
Date last approved:	22 September 2018 (Board of Directors)
Date of next review:	September 2019
Status:	Non Statutory

Tudor Park Education Trust oversees this policy but the local governing body of each academy or school within the Trust is responsible for the implementation of the policy.

Background

Given their contact with young people, members of staff can be vulnerable to allegations of abuse and therefore it is particularly important that staff remain continually aware of behaviour that is acceptable and behaviour that may leave them vulnerable. Such matters are addressed within the school's safeguarding policy and included within the school's induction and training programmes.

The Trust recognises its collective responsibility to safeguard and protect the welfare of children and young people in accordance with its statutory responsibility under section 175 of the Education Act 2002 and, where appropriate, under the Children Act 1989.

This policy provides details of the procedures to be followed in circumstances where an allegation has been made against a member of staff working at the school, whether in a paid or voluntary position, including a member of staff who works with pupils on a temporary or supply basis.

Procedures will be conducted in accordance with the statutory guidance from the DFE www.education.gov.uk/aboutdfe/statutory/g0076914/dealing-with-allegations-of-abuse, the guidance provided by the Hounslow Safeguarding Children Board and with regard to the appropriate legislation.

Reporting an allegation, safeguarding responsibilities and general principles

An allegation should be reported immediately to the school's child protection officer, Hazel Hughes, the Principal or, where the Principal is the subject of the allegation, the chair of governors. An allegation may relate to a concern that a member of staff has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

Where an allegation of abuse towards a pupil has been made against a member of staff, the governing body must recognise the requirement for the sharing of information in accordance with DFE guidance, because the need to promote the welfare and protect the safety of the pupils is paramount. The Hounslow Safeguarding Children Board holds statutory functions which include developing local safeguarding policy and procedures, scrutinising local arrangements and the investigation of allegations concerning persons who work with children.

Should an allegation be made against a member of staff, the school should immediately notify Hounslow's DO for child protection. The allegation must be reported in accordance with the procedures identified below and the initial contact with the DO will be made by the school's child protection officer, the Principal or the chair of governors.

The DO will provide oversight of the individual case, advising and providing guidance to the school in specific matters, including liaising with the police where necessary. The DO should be informed within one working day of all allegations which have come to the school's attention or which have been made directly to the police, and which relate to the criteria above.

Safeguarding advice and allegations management (SAAM)

A new Safeguarding Advice and Allegations Management duty service has been set up for all general safeguarding advice and issues related to the conduct of members of staff. Although formal investigations will still be dealt with by a Designated Officer (the new title for the LADO) the SAAM Duty Desk is the first point of contact for the Local Authority Designated Officer (DO).

This is for general safeguarding advice (ie not about a specific child or family), to discuss a concern about the conduct of a person working with children and young people or to report a safeguarding allegation in respect of a person working with children and young people contact the SAAM Duty Desk: SAAM Duty Desk: 0208 583 5730.

[Determining the outcome of an investigation into an allegation](#)

In determining the outcome of an investigation into an allegation, the following definitions will be used in accordance with DFE guidance.

- Substantiated: there is sufficient identifiable evidence to prove the allegation.
- False: there is sufficient evidence to disprove the allegation.
- Malicious: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false.
- Unfounded: there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively they may not have been aware of all the circumstances.
- Unsubstantiated: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Full details of a substantiated allegation, how it was followed up and resolved, and a summary of the action taken and decisions reached will be retained on the confidential personnel file of the member of staff, and s/he will be provided with a copy.

[The procedure](#)

The governing body takes seriously its responsibilities of duty of care towards its employees. The process will be managed in such a way as to minimise the stress inherent in such circumstances, and appropriate levels of support will be discussed and agreed with any member of staff who is the subject of an allegation, and her/his representative where applicable.

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school is dealt with very quickly, in a fair and consistent way, so that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. In the event that an allegation against a member of staff is made, priority will be given to ensuring that a resolution to the allegation is reached as soon as possible. The procedures will be applied in a fair and consistent manner and in such a way as to protect the pupil.

The timeframe for bringing the matter to a conclusion will depend upon the nature, seriousness and complexity of the allegation, however the school will aim to reach a resolution within one month where this is possible.

Initial considerations

The procedures adopted in relation to allegations made will be applied using common sense, reasonableness and judgement. It is recognised by the DFE that many cases 'may not meet the criteria (set out above), or may do so without warranting consideration of either a police investigation or enquiries by local authority (LA) children's social care services'. Under such circumstances, the governing body will adopt the appropriate procedures set out within its disciplinary policy in order to bring the matter to a conclusion as soon as possible.

In circumstances where the allegations made are serious, they will require immediate intervention by the police. The DO will be informed immediately and advice will be sought regarding contact with the appropriate local agencies.

The school will immediately appoint a case officer, normally the child protection officer, to handle matters in connection with the investigation into the allegation. There will be relevant consideration as to who should carry out the investigation and this may, on occasion, necessitate the appointment of an external investigator.

Following the initial contact with the DO, the case officer will liaise with the DO regarding the nature and context of the allegation in order to agree on the appropriate course of action. The DO may seek additional information from the LA regarding previous history, for example whether a child or her/his family have made similar allegations and the individual's current contact with children in other roles. During such a process, the DO may recommend the involvement of the police. Contact with the member of staff accused must be made as soon as reasonably practicable following consultation with the DO.

In response to an allegation, the governing body will consider all alternative options before taking any decision to suspend a member of staff. Suspension is not considered the default option and such action will only be taken only if there is no reasonable alternative. Reasonable alternatives may include the following, however any decision will be based on assessment of risk and the school's ability to reasonably accommodate an alternative arrangement:

- Redeployment within the school so that the member of staff does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the member of staff has contact with children.
- Redeploying to alternative work in the school so the member of staff does not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the member of staff, making clear this is not a punishment and parents have been consulted.

- Temporarily redeploying the member of staff to another role in a different location.

The individual is advised to contact her/his trade union representative, if they have one, or a colleague who can provide support.

Action will be taken in response to the allegation with due regard to the procedures identified within the school's disciplinary policy. The member of staff against which the allegation is made will be provided with details in writing of the action taken, including suspension if deemed appropriate, and setting out the reasons and justification for the decision.

No case to answer

The process of sharing information and its evaluation may lead the school, in consultation with the DO, to the decision that there is no case to answer and therefore no further action will be taken against the member of staff facing the allegation or concern. In such circumstances, the decision and associated reasons will be recorded by the case officer and the DO, who will agree on the content of a letter to the member of staff, setting out the relevant details. Details of the action to be taken with regard to the member of staff, for example appropriate support, and in respect of the individual/s who made the initial allegation will also be discussed and agreed in accordance with the confidentiality provisions referred to below.

Where it is clear an allegation is unfounded or malicious, the school will aim to resolve the matter within one week.

The investigation process

Where the process of information sharing as specified above leads to a conclusion that there is a case to answer, an investigation process will be required.

The case officer will inform the member of staff regarding the allegations against her/him as soon as possible and following consultation with the DO.

The member of staff will be provided with as much information as possible at that time. Advice should be sought from the DO on what information the school is permitted to disclose to the member of staff, based on the agreement of any other agencies involved. Individuals should be given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police.

If the allegation is 'not demonstrably false or unfounded', and the school has cause to suspect a child is suffering or is likely to suffer significant harm, the case officer, in consultation with the DO will convene a 'strategy discussion' involving the appropriate agencies. Where an allegation concerns physical contact, the agencies will take into account the staff member's entitlement to use reasonable force to control or restrain pupils in certain circumstances.

Where it is clear that an investigation by the police or the children's social care services is unnecessary, or the strategy discussion (see above) agrees that is the case, the case officer will agree with the DO the appropriate way forward. In most cases this will involve the application of the investigation process within the school's disciplinary procedures (please see the school's disciplinary policy for further details).

Keeping the member of staff informed and support

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty. During the investigation, a process will be adopted to ensure that the member of staff who is the subject of the allegations is kept informed. In cases of suspension, this will include the provision of a named contact at the school, appointed by the case officer, in order to facilitate communication throughout the investigation. Contact with the suspended employee will take place according to the timescales to be set out at the start of the investigation and this must include relevant updates on work-related issues.

Similar arrangements will be made by the case officer to appoint a contact to liaise with a member of staff who has remained in the workplace during the investigation.

The named contact will keep the member of staff informed of progress in relation to the case and will monitor the support arrangements in place and recommend additional or alternative support as necessary.

The member of staff who is the subject of the allegations will not be prevented from having social contact with colleagues and friends, unless there is evidence to suggest that such contact may be prejudicial to the investigation process.

Support will be offered by way of occupational health or local welfare arrangements as appropriate.

Supporting parents and the child affected

Parents or carers of a child or children involved will be notified regarding the allegation as soon as possible where they are not already aware of the matter. However, due regard is given to the need for a strategy discussion as appropriate (please see above), or the agreed involvement of other agencies, because the level of disclosure of details must be in accordance with DFE statutory guidance.

Parents or carers will be kept informed, through an agreed named contact, regarding the progress of the investigation, any relevant decisions made regarding the process and, in confidence, the outcome where there is no criminal prosecution. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed and careful consideration must be given to the relevant provisions of the Human Rights Act 1998 and the Data Protection Act 1998.

The named contact will make parents and carers aware of the prohibition on reporting or publishing allegations about teachers in section 141F of the Education Act 2002. Should parents or carers wish to apply to the court for the removal of reporting restrictions, they will be advised to obtain legal advice.

In circumstances where it is believed that a child may have suffered significant harm, or there may be a criminal prosecution, the DO will liaise with the appropriate agencies to consider what support the child or children involved may need. This need will also be highlighted to the DO by the school's case officer.

Malicious allegations

Details of allegations that are investigated and found to be malicious or unsubstantiated will be removed from personnel records and no reference will be made to the matter in employer references. Pupils who are found to have made malicious allegations will be considered in breach of the school's behaviour policy. This will be treated as a serious matter and the appropriate sanctions will be applied.

Confidentiality

The school will make every effort to maintain confidentiality and to guard against unwanted publicity during an investigation or while an allegation is considered. Legislation regarding reporting restrictions will be adhered to at all times, in particular the reporting restrictions under the Education Act 2011 preventing the publication of material that may lead to the accused teacher being identified until the accused is charged with an offence. The legislation imposing restrictions makes clear that 'publication' of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. 'Publication' includes 'any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public'.

However the reporting restrictions cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

The case officer will take advice from the DO and the police in order to agree who needs to be informed and what information can be shared. Advice will also be sought on appropriate sharing of information with the wider community in order to reduce speculation and the management of any press interest, breaches of confidentiality or gossip.

Resignation during the investigation

Should an employee resign during an investigation following an allegation, the school will continue with the investigation process and every effort will be made to reach a conclusion, even in circumstances where the employee refuses to co-operate. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to co-operate with the process. However, the employee will be given the opportunity to remain fully involved in the process and to answer the allegation against them.

Settlement agreements

Settlement agreements will not be used in circumstances where an allegation relates to abuse of a pupil. Such an agreement will not prevent a thorough police investigation where that is appropriate and it cannot override the governing body's statutory duty to make a referral to the disclosure and barring service (DBS) where this is required.

Employer references

Should an allegation or allegations prove false, unsubstantiated, unfounded or malicious it/they will not be referred to in employer references. Additionally, the history of repeated concerns or allegations which have all been found to be unsubstantiated, malicious etc. should also not be included in any reference.

Allegations leading to a criminal investigation or a prosecution

The police or the crown prosecution service (CPS) should inform the school and the DO immediately when a criminal investigation and any subsequent trial is complete, if an investigation is closed without charge, or if there will be no prosecution after the person has been charged. In such circumstances, the case officer will discuss with the DO whether any further action, including disciplinary action, is required and agreement will be reached as to how to proceed. Information received by the police and/or children's social care services will be relied upon in order to inform the decision.

Action on conclusion of a case

Should the allegation be substantiated and the employee is dismissed, or s/he resigns, the DO, the case officer and the school's HR adviser will discuss and agree whether to refer the case to the DBS for consideration of inclusion on the barred lists, or to refer the matter to the Teaching Agency. The governing body has a legal duty to notify the DBS of relevant information, so that individuals who pose a threat to vulnerable groups can be identified and barred from working with these groups. If the school dismisses a member of staff or volunteer because they have harmed a pupil, or because they pose a risk of harm to children or young people, the DBS will be informed. Professional misconduct cases should be referred to the relevant regulatory body and the referral will be made as soon as possible after the removal, or the resignation, of the member of staff involved.

Returning to work

Where a member of staff has been suspended and the conclusion of the investigation is that s/he can return to work, the case officer, in consultation with the Principal, will consider how best to facilitate the return to work. A meeting will be arranged with the member of staff concerned to agree how best this can be achieved and to understand what support will assist her/him in returning to the workplace following this stressful experience.

TUDOR PARK EDUCATION TRUST	Safe Recruitment and Selection Policy Safeguarding Document
Person(s) responsible for updating the policy:	Chief Executive Officer
Date Approved:	September 2018 (Board of Directors)
Date of Next Review:	September 2019
Period of Review:	Annually
Status:	Non Statutory

Tudor Park Education Trust oversees this policy but the local governing body of each academy or school within the Trust is responsible for the implementation of the policy.

Safe Recruitment and Selection

The Disclosure and Barring Services (DBS) was established under the Protection of Freedoms Act 2012 and merges the functions previously carried out by the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA)

Safe recruitment, selection and employment procedures apply to every person who works in our Trust – paid, direct or indirect contact with our young people.

Where the school sub contracts out work or uses external agencies we require the contractor or agency to adopt and implement the measures described in our policy and government guidance. Contractors' compliance will be monitored by the school.

Volunteers – if unknown to the college will go through the same recruitment measures as paid staff. If known to the college and offering one off type support with a member of college staff present a more streamlined process will be adopted.

Statement of Intent

The Trust fully adopts recruitment and selection procedures and other HR management processes that aim to deter, reject or identify people who might abuse children, or are otherwise unsuited to working with them. The Trust takes all necessary steps to check suitability to work with or around children as detailed within the statutory guidance documents 'Working Together to Safeguard Children' (March 2015) and 'Keeping Children Safe in Education' (September 2016). This is achieved by:

- Adhering to the statutory responsibilities to check staff who work with children. In the case of a new appointment, the Trust follows the safer recruitment procedure required by government guidance and set down within the Safer Recruitment Procedure.
- Ensuring checks on all staff, teaching and non teaching, temporary, supply or salaried trainees are in place and details are held on a central record.
- Taking proportionate decisions on whether to ask for any checks beyond what is required.

- Ensuring that checks for volunteers, visitors and contractors are at the appropriate level and supervision is provided accordingly.

If a member of staff has concerns about a visitor, contractor, supply staff, student placement or volunteer's suitability to work with children, they should raise this with the Designated Safeguarding Lead (DSL) – Hazel Hughes – at the earliest opportunity.

Under no circumstances should an individual in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity. A regulated activity includes:

- Teaching, training, instructing or supervising children if the person is unsupervised;
- Providing advice or guidance on wellbeing;
- Driving a vehicle only for children; and
- Regular work within the school with the opportunity for contact with children, but not including work done by supervised volunteers.

All members of our staff will have an enhanced DBS certificate including a barred list check carried out under the Child Workforce Procedures Sept. 2013 prior to appointment.

Any other adult who has unsupervised contact with students, whether in a voluntary or paid capacity, will have an enhanced DBS check included barred list check. In such circumstances, until the DBS check is received they will be supervised by a member of staff who has received their DBS check and a barred list check will be completed.

Equal Opportunitites

The school is aware of its obligations under the Equality Act 2010 and complies with non-discrimination provisions.

Appointments

Those involved in making appointments must ensure that in recruitment procedures any advertisements, short listing and interview procedures are without any direct or indirect discrimination, unless there is a specifically exempt area, for instance relating to sex and decency.

The recruitment and selection process is crucially important and Directors will endeavour through appropriate training to ensure that those making selection and recruitment decisions do not discriminate in making these decisions.

Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.

Selection decisions will not be influenced by perceived prejudices.

Promotion and advancement will be on merit and all decisions related to the same will be made within the overall framework and principles of this policy.

Job descriptions will be in accordance with this policy statement and any job requirements will be reflected accurately in any person specifications.

The approach to the advertising of vacancies will be non-discriminatory.

All applicants applying for posts at the school will receive fair treatment and will be considered solely on their ability to do the job.

All those involved in the recruitment process will review their selection criteria to ensure that they are related to the specific job requirements and do not unlawfully discriminate.

Short listing and interviewing will be carried out by more than one person, in accordance with the school's appointments procedure.

Safe Practice in recruitment

A Director, the Chair of Governors, an additional named Springwest Governor, members of SLT and the Director of HR have all taken the 'Safer Recruitment' training and assessment.

Child protection and safeguarding issues will be promoted at every stage of the recruitment process from the planning, advertisement, collection and checking of information gathered.

- Advertisements will include our Statement of Intent (see above).
- Job descriptions and person specifications will make reference to the responsibility for safeguarding, promoting the welfare of young people and suitability to work with young people.
- The Academy/School Application Form will be used for all applicants and comprehensive information from candidates scrutinised. Any gaps or inconsistencies will be followed up with the candidate.
- Two references will be taken up prior to the interview after short listing. A specific safeguarding and child protection reference will be used.
- At interview questions will be designed to explore the candidate's suitability to work with children as well as their suitability for the post. Candidates will be required to bring to the interview original proof of their identity, the necessary qualification original certificates. These will be checked and a photocopy taken.
- The successful candidate will be required to complete a DBS disclosure form and provide the necessary documentation. An offer of appointment will be conditional upon:
 - receipt of two satisfactory references
 - verification of identity
 - a satisfactory DBS disclosure
 - a separate barred list check if waiting for completion of DBS disclosure
 - verification of the candidates medical fitness
 - verification of qualifications and professional status if not verified at the interview, including external verification check
 - verification of successful completion of statutory induction period for teachers who obtained QTS after 7th May 1999
 - for non teaching posts verification of completion of the probationary period
 - for overseas candidates barred list checks (List 99) and DBS Disclosures must be completed. In addition, for any members of staff who have lived overseas for 3 months or longer in the last five years, the school will make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These further checks will include a check for information about any teacher sanction or restriction that a

European Economic Area (EEA) professional regulating authority has imposed, using the National College for Teaching and Leadership (National College) Teacher Services system.

- prohibition from teaching check
- a section 128 check for any leadership position
- satisfactory completion of the disqualification by association form for teachers.

Where the school has any concerns about an applicant's suitability to work with children, the facts must be reported to the police and / or the DFE's Children's Safeguarding Operations Unit

Post Appointment Induction

There is an induction programme for all staff newly appointed to the schools within the Trust, including teaching staff with previous experience. All new members of staff have an Induction Handbook and have an allocated Line Manager and/or Mentor.

Maintaining a Safer Culture

All staff will have appropriate training so that they understand their roles and responsibilities and are confident in carrying them out.

Procedures and a clear reporting system for students, staff, parents to raise concerns will be shared and publicised. All members of our community must feel they can raise any concerns about the safety and welfare of our members and that they will be listened to.

Monitoring

The Recruitment process and Induction arrangements will be monitored yearly to ensure future best practice. Staff turnover and reasons for leaving will be monitored and exit interviews carried out. Attendance at child protection training will be tracked for all staff.

Safeguarding Procedures for Supply Staff

- The agency sends through their compliance and vetting summary for the member of staff for the first time that they are booked. This includes DBS number and a summary of checks that have been carried out, including eligibility to work in the UK. Some will include a photograph.
- In the rare circumstances that the member of staff has disclose able information The Principal decides if they are willing for them to come to TPET on supply for the day.
- When the agency staff arrive at reception they sign in and have a visitors pass. Photo ID is checked and a note made on the Daily Supply Vetting Summary of checks form. The ID must be either a passport or driving license. The agency photo ID card is not sufficient.
- The ID is checked to make sure that the name and details tie up with the agency summary of who we are expecting.

- A copy of the summary of the agency vetting is kept in the Data Manager's office with a summary of the ID seen and the completed Daily Supply Vetting Form. The Daily Supply Vetting form is signed by the Data Manger who will personally meet staff.
- Once identity has been confirmed and checks completed only then can the agency staff go to in to the Main School. They are given a booklet with our key procedures and priorities to help them throughout the day.
- These procedures apply to daily and long term supply on their first visit. For subsequent visits they need to sign in and if reception has any doubts to identity they can verify by checking the file with the summary.
- If the agency staff has their DBS renewed then the agency will send through an updated summary.

Safeguarding Procedures for Volunteers (including ad hoc, school/unpaid work experience/pre PGCE work experience)

Volunteers can enhance the learning opportunities of our students by contributing a range of skills and experiences. If volunteers are not engaging in regulated activity but have the opportunity to come into contact with children on a regular basis (eg supervised volunteers) the school will undertake a risk assessment, and use professional judgement and experience when deciding whether to seek a barred list check or an enhanced DBS check. In doing so the following will be considered:

- The nature of the work with children;
- Where the volunteer is providing ad hoc or regular support;
- What the school knows about the volunteer, including formal or informal information offered by staff, parents/carers and other volunteers;
- Whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability; and
- Whether the role is eligible for an enhanced DBS check.

Two references will be sought for volunteers.

Prior to their arrival the volunteer should be asked to complete the form in Appendix 1, and upon arrival provide photographic evidence of their identity (eg passport or photocard driving licence). Information will be provided on the school's code of conduct and safeguarding procedures (Appendix 2). They will be expected to wear a school lanyard at all times.

If the volunteer does not have a DBS certificate they should be supervised by a member of staff who has an enhanced DBS check. They are not to be left on their own with a student or group of students.

The Trust may obtain a barred list check where appropriate, and / or an enhanced DBS certificate (which should include barred list information) for all volunteers who are working unsupervised in regulated activity. Depending on the nature of the volunteer's role the cost of obtaining an external check may be passed on to the individual. Where checks are carried out on volunteers these will be recorded in the single central record.

Safeguarding Procedures for trainee / student teachers

Where applicants for initial teacher training are salaried by the school, the checks required for staff appointments will be carried out, including an enhanced DBS certificate (with barred list information).

Where trainee teachers are fee-funded (eg SCITT or PGCE placements), it is the responsibility of the initial teacher training provider to carry out the necessary checks. Evidence of this will be requested by the school by the training provider prior to arrival to confirm that the trainee has been judged by the provider to be suitable to work with children. There is no requirement for the school to record details of fee-funded trainees on the single central record.

On arrival at the school, the individual should provide evidence of photographic identity (eg passport or photo driving licence) and complete the form in Appendix 1. Individuals will be given the school's code of conduct and safeguarding procedures (Appendix 2) and will be expected to wear a school lanyard at all times.

Safeguarding Procedures for Governors and Trustees

The school will ensure that an enhanced DBS check is processed, and that identity checks are completed before any individual takes up their position as school governor or Trustee.

A check will also be carried out to ensure that the individual is not subject to a section 128 direction that would prevent them from taking part in the management of a school. Further checks may be carried out as considered appropriate where, by reason of the individual's living or having lived overseas, obtaining an enhanced DBS certificate is not sufficient to establish his or her suitability to carry out duties in a school. Details of the check carried out will be recorded on the single central record.

All Governors and Trustees will be given information on the school's code of conduct and safeguarding policy. They will also undertake safeguarding training. Governors and Trustees will be expected to wear the school lanyard at all times during the school day.

Governance is not a regulated activity and so governors / trustees do not need a barred list check unless, in addition to their governance duties, they also engage in a regulated activity.

Safeguarding Procedures for Contractors

Under no circumstances should a contractor in respect of whom no checks have been obtained be allowed to work unsupervised during the school day/term, or engage in a regulated activity. The appropriate level of supervision will depend on the circumstances.

The school will ensure that any contractor who is to work regularly at the school, has been subject to the appropriate level of check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information). For all other contracts who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required, or supervision at all times on the premises will be provided.

In the event that a contractor has a Standard DBS certificate, a risk assessment will be carried out regarding the nature of the work being carried out and the location, timing and timescale of work being carried out.

The contractor is responsible for confirming what checks have been carried out on their employees as part of the tendering process. This should be in writing.

Where a contractor is self employed, the school may consider obtaining the DBS check, as self employed people are not able to make an application directly to the DBS on their own account.

On arrival, the identity of the contractor should be confirmed by photographic evidence (eg company identity card), given details of the school's code of conduct and safeguarding procedures (Appendix 2), and if the contractor does not have a DBS certificate, they will be supervised whilst on the premises during the school day/term. All contractors will be expected to sign in at Reception and wear a school lanyard at all times.

A central list of contractors will be kept on the single central record.

Safeguarding Procedures for Lettings

During normal school hours, the Trust is responsible for safeguarding children and vulnerable adults on its site. Hirers are expected to comply in full with the Trust's safeguarding policies and ensure that they report to reception on arrival and wear their visitor passes at all times.

Where a third party hires the Trust's premises outside school hours, the responsibility for ensuring that safeguarding measures are in place rests with the Hirer. However, the Trust takes safeguarding very seriously and is committed to working with Hirers to ensure that safeguarding standards are high and to minimise any potential risk. It is a condition of hire that the Hirer undertakes to ensure that suitable arrangements are in place in regard to safeguarding children and vulnerable adults and that each and every person employed by or under the control of or acting on behalf of the Hirer who has any contact with children or vulnerable adults at the premises shall have a satisfactory enhanced Disclosure and Barring Service Certificate in place and held by the Hirer. The terms and conditions that Hirers sign state that they will produce to Governors, upon request, a copy of its Safeguarding Policy. The terms and conditions also set out that in addition to the general right of termination, the Governors reserve the right to end the Lettings Agreement with immediate effect if the Hirer does not have adequate safeguarding arrangements in place. Spot checks will be conducted to ensure compliance.

Safeguarding Procedures for visitors (including parents/carers who attend an event during the school day)

Individual visitors arriving at the school reception will be met, escorted and supervised by the member of staff they are meeting whilst on school premises during the school day/term.

Staff will be reminded to remain vigilant during events or occasions where parents and carers have been invited and politely question any individuals who may either be lost or have veered away from the event location.

Visitors will be given details of the school's code of conduct and safeguarding procedures (Appendix 2),

PERSONAL INFORMATION FORM

Volunteers, trainee teachers, students on work-related learning, and others classed as ‘volunteers’ for Single Central Record (SCR) purposes.

Please provide Tudor Park Education Trust with the following information to enable us to maintain our SCR and comply with Safeguarding requirements. All data will be treated in accordance with our Data Protection Policy, and relevant legislation.

For completion by the individual

Full name	
Address	
Contact phone number	
Email	
Date of birth	
National Insurance Number	
Nature of role at the school	
Start and finish dates	
DBS Disclosure number #	
DBS issue date	

in some cases the school may need to apply for a DBS Disclosure on your behalf and / or a Barred List Check (L99), for which a cost may be payable.

I confirm that I know of no reason why I should not undertake a role at the school. (Please note that It is a criminal offence for barred individuals to seek, or to undertake, work with children.)

Signed: _____ Date: _____

For completion by TPET

DBS Enhanced disclosure seen	Yes / No / Not Applicable
Barred List check (L99)	Yes (paid by applicant) / No / Not applicable
Identity confirmed	Yes / No (Please attach a copy of ID documents)
Safeguarding information given	
Name of person undertaking checks	
Date	

NB individuals without an enhanced DBS must be accompanied by a member of staff, and must not be left unsupervised with students.

SAFEGUARDING CHILDREN AND CHILD PROTECTION
Guidance for Visitors, Volunteers, Agency Staff and Contractors

Tudor Park Education Trust is committed to safeguarding and promoting the welfare of children and young people and expect all members of the school community including staff, parents, governors, contractors, visitors and volunteers to share this commitment.

This guidance contains important information about child protection and the procedures that must be observed by all adults working with and around children and young people at Tudor Park Education Trust, and reflects the DFE guidance 'Working Together to Safeguard Children' (2015) and 'Keeping Children Safe in Education' (2016).

Please see below the designated safeguarding staff at Tudor Park Education Trust:

**The Designated Safeguarding Lead (DSL) is: Hazel Hughes -
Director of Safeguarding and SENDCO**

**The Deputy Designated Safeguarding Lead (DDSL) at Springwest is:
Mariella Wilson – Principal**

**The Deputy Designated Safeguarding Lead (DDSL) at Logic Studio
School is: John Cadogan – Vice Principal**

What to do if you are concerned

If you have any concerns about the welfare of any child at this school or feel that something may be troubling them, you should share this information immediately with the DSL or a DDSL. You may feel that you are reporting small matters but we would rather that you tell us things which turn out to be small than miss a worrying situation. Some cases have shown that small, unconfirmed worries are in fact the tip of the iceberg, and where information is placed alongside that of other school colleagues it can add up to a serious cause for concern. It is vital, therefore, that even vague worries or concerns are passed on at the earliest stage to the DSL.

Child Protection Procedures

Everyone who works with children, especially those who have regular daily contact, has a duty to help protect children from abuse. Please be aware that a child may disclose abuse to you; they may do this directly by telling you what happened or indirectly by telling friends, or by asking for advice about a situation, say involving another person. In school you may particularly notice changes, for example in the child's presentation, behaviour, friendships, application to study or behaviour changes with adults within the setting, including staff and parents/carers.

**We ask that you report anything which may worry you immediately to the DSL or a DDSL.
The Safeguarding & Child Protection Policy is available on the school's website.**

TUDOR PARK EDUCATION TRUST	Visiting Speakers Policy Safeguarding Document
Person(s) responsible for updating the policy:	Chief Executive Officer
Date last approved:	22 September 2018 (Board of Directors)
Date of next review:	September 2019
Status:	Non Statutory

Tudor Park Education Trust oversees this policy but the local governing body of each academy or school within the Trust is responsible for the implementation of the policy.

Purpose

To safeguard and promote the welfare of children and young people and the expectation that all staff, teaching and non-teaching (including temporary and supply staff), governors and volunteers to share this commitment.

Responsibility

Chief Executive Officer, Principals of Springwest Academy and Logic Studio School and Director of Safeguarding/Designated Safeguarding Lead and all staff.

Procedure to be followed prior to day of visit

1. The Principal must be informed at least three weeks in advance, where possible, that a visiting speaker is to be invited to the school.
2. The member of staff requesting the visit must complete the request form (Appendix 1) and pass to the Principal.

The Principal can then give outline authorisation for the speaker to be booked.

3. Following the Principal giving provisional permission, the name of the intended speaker and details of any organisation represented must be forwarded to Penny Davies.
4. Once this information is passed on to Penny Davies, the process of vetting will begin.
5. Penny Davies will advise the Principal of the vetting outcome. Final clearance for the visiting speaker can then be granted by the Principal. If the school has any concerns during the vetting process, Penny Davies advise Hazel Hughes (Designated Safeguarding Lead) who will pass any relevant information to the Local Authority Prevent officers.
6. The member of staff responsible for booking the speaker must ensure the Visiting Speaker agreement form (Appendix 2) is read and signed. This needs to be completed, signed and

returned to Penny Davies before the presentation can begin.

The form indicates a commitment to the following:

- The speaker must not incite hatred, violence or call for the breaking of the law.
- The speaker is not permitted to encourage, glorify or promote any acts of terrorism including individuals, groups or organisations that support such acts.
- The speaker must not spread intolerance in the community and thus aid in disrupting social and community harmony.
- The speaker must seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge.
- The speaker must adhere to the school's equal opportunities and safeguarding policies.
- The speaker is not permitted to raise or gather funds for any external organisation or cause without express permission of the Principal.
- The speaker should be advised that they will be required to sign an agreement before speaking. If requested, a copy of the agreement will be sent to the speaker in advance of the presentation.

Procedure to be followed on the day of the visit

7. On arrival, the visiting speaker should be met in Reception, an ID badge issued and a member of school staff should remain with the speaker during the entire duration of their time in school.
8. Prior to the speech / presentation the Visiting Speaker Agreement form must be read and signed by the visiting speaker and returned to a member of the school staff.
9. During the speech / presentation at least one member of staff will be present at all times.
10. Following the address / assembly the guest should be accompanied by a member of staff to Reception where they should sign out and leave the premises.
11. The member of staff organising the visiting speaker should review / evaluate the address by the guest speaker and report any concerns to the Designated Safeguarding Lead immediately.
12. If concerns are raised, the Designated Safeguarding Lead will take action to address the concern in line with the school's Safeguarding policy.
13. Records of Visiting Speakers will be maintained by Penny Davies.

APPENDIX 1: REQUEST FOR PRIOR APPROVAL FOR VISITING SPEAKER

Name of member of staff making request:

Proposed date of event / visiting speaker:

Brief description of event / reason for visit:

Target audience (teaching group / year groups etc):

Approximate audience number:

Details of the visiting speaker (brief biography):

Topic of the proposed presentation and short summary of content to be covered:

If applicable, the name of the organisation the visiting speaker represents:

CIRCULATION: Please sign and pass on in the order shown below:

To be seen by	Principal	Principal's PA
Initials		
Date		

Prior approval granted (please delete / highlight as necessary)

Yes / No

If denied, reasons for not granting approval:

APPENDIX 2: AGREEMENT AND GUIDELINES FOR VISITING SPEAKERS

Tudor Park Education Trust is committed to safeguarding and promoting the welfare of children and young people and expects all staff, teaching and non-teaching (including temporary and supply staff), governors and volunteers to share this commitment.

Tudor Park Education Trust takes seriously its responsibility under section 175 of the Education Act 2002 and existing documentation including 'Keeping Children Safe in Education' July 2015 relating to Child Protection to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are adequate arrangements within our school to identify, assess and support students.

Name of visiting speaker:

Organisation (if applicable):

The visiting speaker agrees to the following terms and conditions:

1. The presentation must be appropriate to the age and maturity level of the student audience. Appropriate dress, language and behaviour are required at all times.
2. The presentation must not incite hatred, violence or call for the breaking of the law.
3. The visiting speaker is not permitted to encourage, glorify or promote any acts of extremist behaviour including individuals, groups or organisations that support such acts.
4. The visiting speaker must seek to avoid insulting other faiths or groups, within a framework of positive debate and challenge.
5. Visiting speakers are not permitted to raise or gather funds for any external organisation or cause without express permission from the Principal.
6. Compliance with the school's Equal Opportunities and Safeguarding Policy.
7. School staff have the right and responsibility to interrupt and / or stop the presentation for any violation of this agreement.

I have read these guidelines and agree to abide by them.

Visiting speaker's signature: _____ Date: _____

TUDOR PARK EDUCATION TRUST	Whistle Blowing Policy
Person(s) responsible for updating the policy:	Chief Executive Officer
Date last approved:	23 September 2018 (Board of Directors)
Date of next review:	Autumn Term 2019
Status:	Non statutory

Tudor Park Education Trust oversees this policy but the local governing body of each academy or school within the Trust is responsible for the implementation of the policy.

Introduction

Tudor Park Education Trust seek to run all aspects of school business and activity with full regard for high standards of conduct and integrity. If members of school staff, parents, governors or the school community at large become aware of activities which give cause for concern, we have this whistle blowing policy. This acts as a framework to allow concerns to be raised confidentially and provides for a thorough and appropriate investigation of the matter to bring it to a satisfactory conclusion, under the school's disciplinary procedure.

We are committed to tackling fraud and other forms of malpractice and treat these issues seriously. We recognise that some concerns may be extremely sensitive. We have therefore developed a system which allows for the confidential raising of concerns within the school environment but which also has recourse to an external party outside the management structure of the school.

Appropriate circumstances for whistle blowing

Individuals are encouraged to come forward with genuine concerns, knowing that they will be taken seriously. A whistle blower should ask themselves a few questions about their concern before taking action:

- Is it in the public interest?
- Is it, or do you believe it to be, illegal?
- Is it a criminal offence?
- Is the environment damaged or likely to be damaged?
- Is it, or do you believe it to be, against codes of practice issued by the school, the local authority (LA), the DFE or a professional body?
- Does it contradict what the employee has been taught, or should have been taught?
- Is it about an individual's behaviour or is it about general working practices?

- Has the whistle blower witnessed the incident?
- Does it constitute the covering up of wrongdoing?

If any individual raises malicious unfounded concerns or attempts to make mischief, this will also be taken seriously and may constitute a disciplinary offence or require some other form of penalty appropriate to the circumstances. The Principal will consider whether any disciplinary action is appropriate against the individual who made it. The police may be asked to consider whether any action might be appropriate against the person responsible, even if he or she was not a pupil or employee.

Examples of issues include:

- Manipulation of accounting records and finances.
- Inappropriate use of school assets or funds.
- Gross mismanagement of funds.
- Decision making for personal gain.
- Any criminal activity.
- Damage to the environment of the school, to property belonging to the school or to a member of the school community.
- Dangerous practices.
- Child protection issues including sexual, emotional or physical abuse of pupils or others.
- Abuse of position.
- Serious misuse or abuse of authority.
- A miscarriage of justice
- Fraud and deceit or corrupt practices.
- Serious breaches of school procedures which may advantage a particular party (for example, tampering with tender documentation, failure to register a personal interest).
- Other unethical conduct, including the circulation of inappropriate e-mails.
- A breach of any legal obligation.
- Suppressing information about anything listed above.

Whistle blowers are encouraged to put their name to an allegation. If confidentiality is requested, the governing board will do its best to protect the identity of any member of staff who raises concerns. It will not disclose the identity of the whistle blower to the person who is the subject of the disclosure or to others not involved in the investigation unless it is absolutely necessary to do so and only with the prior consent of the individual concerned.

There are, however, circumstances under which complete confidentiality may be difficult for the governors to maintain. For example:

- If the matter leads to a legal procedure and evidence is required by the court.

- If the issue raised comes within the remit of another school procedure and the whistle blower is asked to provide a signed statement as part of the evidence, thus revealing their identity.
- When the safeguarding of children is the issue.

Anonymous allegations will only be considered if the issues raised are:

- Very serious.
- The credibility of the allegation is considered to be high.
- The likelihood of confirming the allegation is high.

Procedure

Stage 1

- As the first step, you should raise the matter with an appropriate level of line management which would normally be your own line manager or the member of staff designated to deal with initial whistle blowing. Much depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of malpractice. If you believe that your immediate manager(s) is involved, the Principal or chair of governors should be approached. If you work at small primary or special school, you would probably go straight to the Principal.
- Concerns may be raised orally or in writing, but it is preferable for an allegation to be set out in writing. An allegation may also be made by phone or email. It is important, however, that when the concern is raised, you make it clear that the issue is being raised under the whistle blowing policy.
- You will be asked to demonstrate to the person that you contact that there are sufficient grounds for concern.
- If the allegation is written, the background and history should be set out, giving names, dates and places wherever possible, and the reasons why the situation is a cause for concern. You should date and sign this statement.
- If the allegation is made orally, you can invite a friend or representative of a trade union/professional association to be present. It is also permissible for a trade union or professional association representative to raise the matter on your behalf.
- If you wish to raise the concern confidentially, this must be made clear to the person who is initially contacted.
- If you have raised the issue orally, you will be asked to put your concerns into writing, which you should date and sign.
- You will be told what steps the line manager intends to take to address the concern. He/she may be able to take the appropriate steps to investigate the matter raised. Alternatively, he/she may refer the matter to a member of the senior leadership team, the Principal or to the chair of governors.
- Once the issue has been raised, you will be contacted within five working days by the Principal or the chair of governors who will arrange to meet to discuss the matter. Again, a friend or trade union/professional association representative may accompany you for the purposes of giving support.
- Notes will be taken of the details of the concern and you will be asked to sign a copy of these notes.

- Depending on the gravity of the allegation, the Principal will consult with the appropriate body. It is at this point that it may become impossible to retain complete confidentiality, should the matter become an issue, for example for the school's disciplinary policy or even a matter for the police. The Principal should always inform the Chief Executive Officer.
- An initial response will be given within five working days. You will be informed of the progress of the investigation and if continued confidentiality is an issue.
- When the matter has been fully investigated and a conclusion reached, a formal written response will be sent to you.
- The line manager/Principal will also notify the person who is the subject of the disclosure within five working days of the meeting. Upon receipt of the information, the individual will be able to appeal against any decisions by writing to the Principal or governing board.

Stage 2

- If you are dissatisfied with the school's response, you can raise the matter within 10 working days of the date of the school's response by writing to the Principal or chair of governors.
- The Principal/chair of governors will then write to you within five working days of receiving the letter to arrange a meeting to discuss the continuing concerns and why you are dissatisfied with stage 1. This meeting should take place promptly. Again, you may be accompanied by a friend or representative of your trade union/professional association.
- The Principal/chair of governors may then decide to investigate further and will need to decide what action to take. You will be updated with the outcome of the meeting within five working days.

Stage 3

- If you are dissatisfied with the outcome of stage 2, you may opt to take the matter to stage 3, by raising the matter externally within 10 working days of the date of the decision letter at stage 2, with any of the prescribed people or bodies recommended in the government publication 'Blowing the whistle to a prescribed person: a list of prescribed people and bodies' available from www.gov.uk.

In taking your concern outside the school, you should ensure that, as far as possible, the matter is raised without confidential information being divulged.

You are protected by law from dismissal, harassment, bullying or other detriment by your employer or other members of staff with whom you work. If this occurs, you have the right to take your case to an employment tribunal.

Allegations against the Principal

If an employee is concerned that the Principal is the wrongdoer or involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigation, this should be reported to the chair of governors. The governors may investigate the allegation themselves in the first instance but are recommended to involve the Chief Executive Officer. If the employee feels that the governors have not dealt appropriately with the issue then he/she may wish to appeal directly to the Chief Executive Officer. Employees who feel unable to follow this route have the option of contacting one of the prescribed persons as in stage 3 above or one of the following government departments as appropriate:

- HM Revenue and Customs.
- The Financial Services Authority.
- The Office of Fair Trading.
- The Health and Safety Executive.
- The Environment Agency.
- The Director of Public Prosecutions.
- The Serious Fraud Office.
- The Education Funding Agency.
- The Department for Education.
- The National College for Teaching and Leadership.