Overarching Safeguarding Policy

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"Learning together, to be the best we can be"

1. Scope

1.1. This overarching safeguarding policy has been developed and published to outline the Nexus Multi Academy Trust commitment to a best practice approach in safeguarding children and young people from harm.

1.2. Each constituent academy within Nexus MAT will have its own local Safeguarding Policy, which will outline the specific roles, responsibilities and local procedures for acting quickly and confidently when a safeguarding issue/concern arises, aligned to the procedures of the Local Safeguarding Children's Partnership in the area in which the school is located.

1.3. Safeguarding children is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.

1.4. Our pupils' welfare is our paramount concern. The Trust, through its defined quality assurance processes, will ensure that all schools within Nexus safeguard and promote the welfare of pupils and work together with other agencies to ensure that the academy has adequate arrangements to identify, assess and support those children who are suffering or likely to suffer harm.

1.5. Every one of our academies is a community and all those directly connected - staff members, governors, parents, families and pupils - have an essential role to play in making it safe and secure.

2. Ethos

2.1. We believe that all our academies should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of each individual child.

2.2. We recognise the importance of providing an environment within our academies that will help children feel safe and respected. We recognise the importance of enabling children to talk openly and to feel confident that they will be listened to.

2.3. We recognise that all adults within the academy - including permanent and temporary staff, volunteers and governors - have a full and active part to play in protecting our pupils from harm.

2.4. We will work with parents to build an understanding of the Trust's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

3. The legal framework

3.1. Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school. Section 157 of the same Act places a similar duty on non-maintained and independent schools, including free schools and academies.

3.2. Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to cooperate with the local authority to improve the well-being of children in the local authority area.

3.3. Under section 14B of the Children Act 2004, the Local Safeguarding Children Partnership can require a school or further education institution to supply information in order to perform its functions. This must be complied with.

3.4. All Nexus academies must also ensure compliance with the most recently published statutory guidance "Keeping Children Safe in Education".

4. Roles and responsibilities

4.1. As a MAT, Nexus has adopted the NHS Principles for managing quality, drawing on the RASCI descriptors:

4.1.1. **R**esponsible - (Doer) - The team/person assigned to do the work. At Academy level, this will be the named Headteacher. The accounting officer (Chief Executive Officer) is responsible for provision Trust-wide, with Headteachers holding delegated responsibility for their academy within the Trust accountability and quality assurance frameworks. Predominately with regard to safeguarding children, this would be the academy designated safeguarding lead (DSL);

4.1.2. **A**ccountable - (Buck stops here) - The team/organisation/person making the final decision with ultimate ownership. This is the Trust Board of Directors as a collective, discharged through their oversight of the accounting officer. The accounting officer is **personally accountable** to Parliament. With regard to safeguarding children in individual academies this would be the Headteacher in agreement with the DSL;

4.1.3. **S**upporting - (Here to help) - The functional host team/person/organisation that will support the work. This typically refers to an academy workforce and/or the central MAT team;

4.1.4. **C**onsulted - (In the Loop) - The team/people/organisations that must be consulted before a decision or action is taken. Routinely this will relate to parents/carers and other key stakeholders. However, where a statutory process is in place then other key parties will be identified by the lead statutory agency e.g. in a case where a child is Missing from Education then the Local Authority would need to be consulted;

4.1.5. **I**nformed - (For Your Information) - The team which must be informed that a decision or action has been taken. This will typically refer to the wider school community. Local Safeguarding Children Partnerships may also fit into this descriptor in some capacity.

4.2. The MAT has a published Scheme of Delegation which should be read in conjunction with the RASCI descriptors.

4.3. Every academy within Nexus must have a named lead person with overall responsibility for child protection and safeguarding, who is called the Designated Safeguarding Lead (DSL).

4.4. The DSL will be a member of the academy's senior leadership team. This person will have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

4.5. Each academy also has a named deputy DSL.

4.6. Safeguarding is scrutinised by governance through the work programme of the Schools' Performance Scrutiny Board, which in turn reports in to the Standards Committee of the Trust Board of Directors. There is a central Trust lead for coordinating Safeguarding quality assurance activity, and central Trust executive staff line managing Headteachers undertake routine review of safeguarding practice in schools through monthly supervision.

4.7. Every DSL is given the option to access clinical safeguarding supervision on a half termly basis, from an independent, qualified children's social worker.

4.8. There is a named Director for Safeguarding who takes a lead on all other governance safeguarding matters, and is a member of the Trust's Standards Committee. The named Director for Safeguarding is **Phil Bradley.**

4.9. The case manager for dealing with allegations of abuse made against academy staff members is the Headteacher or their named deputy. The case manager for dealing with allegations against the Headteacher or other

executive leaders is the Trust Chief Executive Officer, or their named deputy. The Chair of the Board of Directors is responsible for dealing with allegations against the Chief Executive Officer. The procedure for managing allegations is detailed in the Trust's "Responding to Allegations Against Employees" policy.

4.10. The Headteacher will ensure that the policies and procedures adopted by the Trust Board are fully implemented in their academy and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities.

4.11. The Schools Performance Scrutiny Board is responsible to the Trust Board for assuring Directors that safeguarding arrangements are fully embedded within the ethos of our academies and reflected in day-to-day practice. External audit is commissioned to provide independent assessment of arrangements, on a termly basis, for all schools.

4.12. All staff members, governors, volunteers and external providers must know how to recognise signs and symptoms of abuse, how to respond to pupils who disclose abuse and what to do if they are concerned about a child.

5. Supporting children

5.1. Nexus Multi Academy Trust recognises that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and some sense of blame. Our academy may be the only stable, secure and predictable element in their lives.

5.2. We accept that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

5.3. Our academies will support all pupils by:

- ensuring the content of the curriculum includes social and emotional aspects of learning;
- ensuring a comprehensive curriculum response to embed online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly;
- ensuring that filtering and monitoring systems keep all children safe in school;

- ensuring that child protection is included in the curriculum to help children stay safe, recognise when they do not feel safe and identify who they might or can talk to;
- providing pupils with a number of appropriate adults to approach if they are in difficulties;
- supporting the child's development in ways that will foster security, confidence and independence;
- encouraging development of self-esteem and self-assertiveness while not condoning aggression or bullying;
- ensuring repeated hate incidents, e.g. racist, homophobic or gender- or disability-based bullying or harassment, from whatever source, are considered under child protection procedures;
- liaising and working together with other support services and those agencies involved in safeguarding children; and
- monitoring children who have been identified as having welfare or protection concerns and providing appropriate support.

6. Use of secured spaces to keep children safe

6.1. It is common place for schools – particularly those with a nursery – to have entrance/exit doors for classrooms which have two handles – one at standard (waist) height, and another toward the top of the door.

6.2. These doors are not locked, but have an enhanced access system which is standard across schools and nurseries across the country, which provides a safe means of ensuring young children are suitably safeguarded from leaving the classroom area of their own volition. These types of arrangements are typical and lawful, and should continue to be used where age-appropriate, though this must be reflected in the class risk assessment and parents/carers should be aware that these safeguards are in place.

6.3. It is also common place – and an acceptable part of our site health, safety and safeguarding measures – to have secure buildings or areas of the school building e.g. school departments, entrance ways etc., where fob-controlled maglocks are used to restrict access to parts of a school building.

6.4. However, the routine use of locked classroom doors – i.e. those doors locked with a key or with an electronic fob that can only be unlocked by an adult, holding a handle to stop a child exiting etc. - should only be used in exceptional circumstances, as the disproportionate use of these security measures could put the school/Trust in breach of the Deprivation of Liberty Safeguards (DOLS) and/or the Mental Health Act (MHA).

6.5. Whilst this legislation doesn't specifically apply to schools, case law (*C v A Local Authority)* following a Court of Protection ruling in 2011 sets the precedent that the principles in both these statutory instruments are relevant to schools and should be taken into account.

6.6. Where it is necessary for the safety and protection of a child to place them in a room that is locked and only unlockable by an adult, this **must** be a safety measure that is included in a child's Education Health and Care Plan (EHCP) and/or their care plan.

6.7. Other statutory agencies (health and social care) should agree that this measure is proportionate, and those with parental responsibility should also agree with this approach. A record of this agreement should be kept by school.

6.8. A risk assessment should also be in place. The care plan and risk assessment should be reviewed at least half termly by the multi-agency team, so that any deprivation of liberty is proportionate and commensurate with need and continues no longer than is necessary. The Trust Competent Person should also be asked to provide advice.

6.9. Where a child - requiring such high level security - is part of a wider class group who are also, by association, confined to a secured space: then parents must also be clear this is the case; be given the opportunity to see an anonymised version of the associated risk assessment; and must agree that they are happy for their child to be placed in a class where this model is in place. A record of this agreement should be kept by school.

6.10. In exceptional and unexpected circumstances, it may be a requirement to keep a child/children in a secure area for their own immediate protection and/or for the protection of others. This is only acceptable where this is unavoidable and the only means available to ensure a Headteacher can discharge their duty of care to pupils and staff, and Heads should follow the school lockdown policy.

6.11. Where intervention of this nature is required for a pupil, then this should be followed by a prompt and immediate multi-agency review of the child's care plan and risk assessment.

7. Child protection and safeguarding procedures

6.1. Each academy within Nexus Multi Academy Trust will have a structured procedure in line with their Local Safeguarding Children Partnership which

will be followed by all members of the academy community in cases of suspected abuse.

6.2. The name of the DSL and Deputy DSL will be clearly advertised in the academy, with a statement explaining the academy's role in referring and monitoring cases of suspected abuse.

6.3. Each academy will ensure all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children by publishing the policy and procedures on their website.

6.4. Where a Headteacher has concerns about a pupil remaining safe in school (e.g. due to complex medical needs), they must follow the procedure outlined in appendix a, which works in conjunction with the government's statutory guidance for "Supporting pupils at school with medical needs" and section 3 of the Children Act (1989).

8. Record keeping

7.1. All child protection and welfare concerns will be recorded and kept in line with the Local Safeguarding Children Partnership guidance and other statutory guidance.

7.2. We will continue to support any pupil leaving the academy about whom there have been concerns by ensuring that all appropriate information, including child protection and welfare concerns, is forwarded under confidential cover to the pupil's new setting as a matter of priority.

9. Low Level Concerns

9.1. As part of our commitment to safeguarding and in accordance with 'Keeping Children Safe in Education' statutory guidance we must ensure that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the Multi Academy Trust and Employee Code of Conduct. This includes the expectation that staff report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

9.2. The purpose of reporting low levels concerns is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in our Safeguarding and Child Protection policy are lived, monitored, and reinforced and any concerns about adults are dealt with promptly and appropriately.

9.3. This applies to all staff and other individuals who work or volunteer in school.

10. Definition of a low-level concern

10.1. A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the "Guidance for safer working practice" (May 2019) and Employee Code of Conduct; and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

10.2. Examples of behaviour that could require reporting of a low-level concern include, but are not limited to:

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

10.3. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

10.4. It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the Responding to Allegations Policy), are shared responsibly and with the right person, and recorded and dealt with appropriately.

10.5. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

11. Reporting low-level concerns

11.1. Where a low-level concern has been identified, this must be reported as soon as possible to the Headteacher. However, it is never too late to share a low-level concern if this has not already happened.

11.2. A summary of the low-level concern should be written down, signed, timed, dated wherever possible and shared with the Headteacher.

11.3. Where the Headteacher is not available, the information will be reported to the (or deputy), i.e. the most senior member of SLT acting in this role. DSL

11.4. Low-level concerns about the DSL will be reported to the Headteacher and those about the Headteacher will be reported to the Trust's Chief Executive Officer.

11.5. It may be the case that a person finds themselves in a situation which could be misinterpreted, or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Employee Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

11.6. All information on low level concerns will be stored securely within the academies safeguarding systems, with access only by the leadership team. This will be stored in line with the Multi Academy Trusts GDPR and data protection policies.

11.7. The member of staff reporting the concern must keep the information confidential and not share the concern with others apart from the Headteacher. The person bringing forward the concern will be named in the written record. Where they request to remain anonymous, this will be respected as far as possible. However, there may be circumstances where this is not possible, e.g. where a fair disciplinary investigation is needed or where a later criminal investigation is required.

11.8. Where a low-level concern has been raised this will be taken seriously and dealt with promptly.

12. Safer workforce and managing allegations against staff and volunteers

8.1. We will prevent people who pose risks to children from working in our academies by ensuring that all individuals working in any capacity have been subjected to safeguarding checks in line with the statutory guidance Keeping Children Safe in Education. Please cross reference with each school's local safe recruitment procedure.

8.2. We will ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working in our academy.

8.3. Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

8.4. We will ensure that at least one member of every interview panel has completed safer recruitment training.

8.5. We have a procedure in place to handle allegations against members of staff and volunteers in line with Keeping Children Safe in Education.

9. Staff Induction, Training and Development

9.1. All new members of staff, including newly-qualified teachers and teaching assistants, will be given induction that includes basic child protection training on how to recognise signs of abuse, how to respond to any concerns, e-safety and familiarisation with the safeguarding and child protection policy, staff code of conduct, Keeping Children Safe in Education and other related policies.

9.2. The induction will be proportionate to staff members' roles and responsibilities.

9.3. The DSL will undergo updated child protection training every two years.

9.4. All staff members of the academy will undergo live safeguarding training (whole-academy training) which is regularly updated and at least every two years.

9.5. Staff members who miss the whole-academy training will be required to undertake other relevant training to make up for it, e.g. by joining another academy's whole-academy training.

9.6. The nominated link governor for safeguarding and child protection will undergo training prior to or soon after appointment to the role.

9.7. We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-academy training if it takes place during their period of work for the academy.

9.8. All academies will maintain accurate records of staff induction and training.

10. Confidentiality, Consent and Information Sharing

10.1. We recognise that all matters relating to child protection are confidential. The Headteacher or the DSL will disclose any information about a pupil to other members of staff on a need-to-know basis only.

10.2. All staff members must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

10.3. All staff members have a professional responsibility to share information with other agencies in order to safeguard children.

10.4. All our staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

10.5. We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.

11. Multi-agency working

11.1. We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the Police and Children's Social Care.

11.2. We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

11.3. We will participate in serious case reviews, other reviews and file audits as and when required to do so by the Local Safeguarding Children Partnership. We will ensure that we have a clear process for gathering the evidence required for reviews and audits, embedding recommendations into practice and completing required actions within agreed timescales.

12. Whistle-blowing and complaints

12.1. We recognise that children cannot be expected to raise concerns in an environment where staff members fail to do so.

12.2. We will ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues.

12.3. We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice, and will ensure that these are taken seriously.

12.4. We will actively seek the views of children, parents and carers and staff members on our child protection arrangements through surveys, questionnaires and other means.

13. Site security

13.1. All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light.

13.2. All academies check the identity of all visitors and volunteers coming into school. Visitors are expected to sign in and out in the office visitors' log and to display a visitor's badge while on the academy site. Any individual who is not known or identifiable will be challenged for clarification and reassurance.

13.3. The Trust will not accept the behaviour of any individual, parent or anyone else, that threatens academy security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the academy site.

14. Quality assurance

14.1. We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of child protection files and records by the DSL.

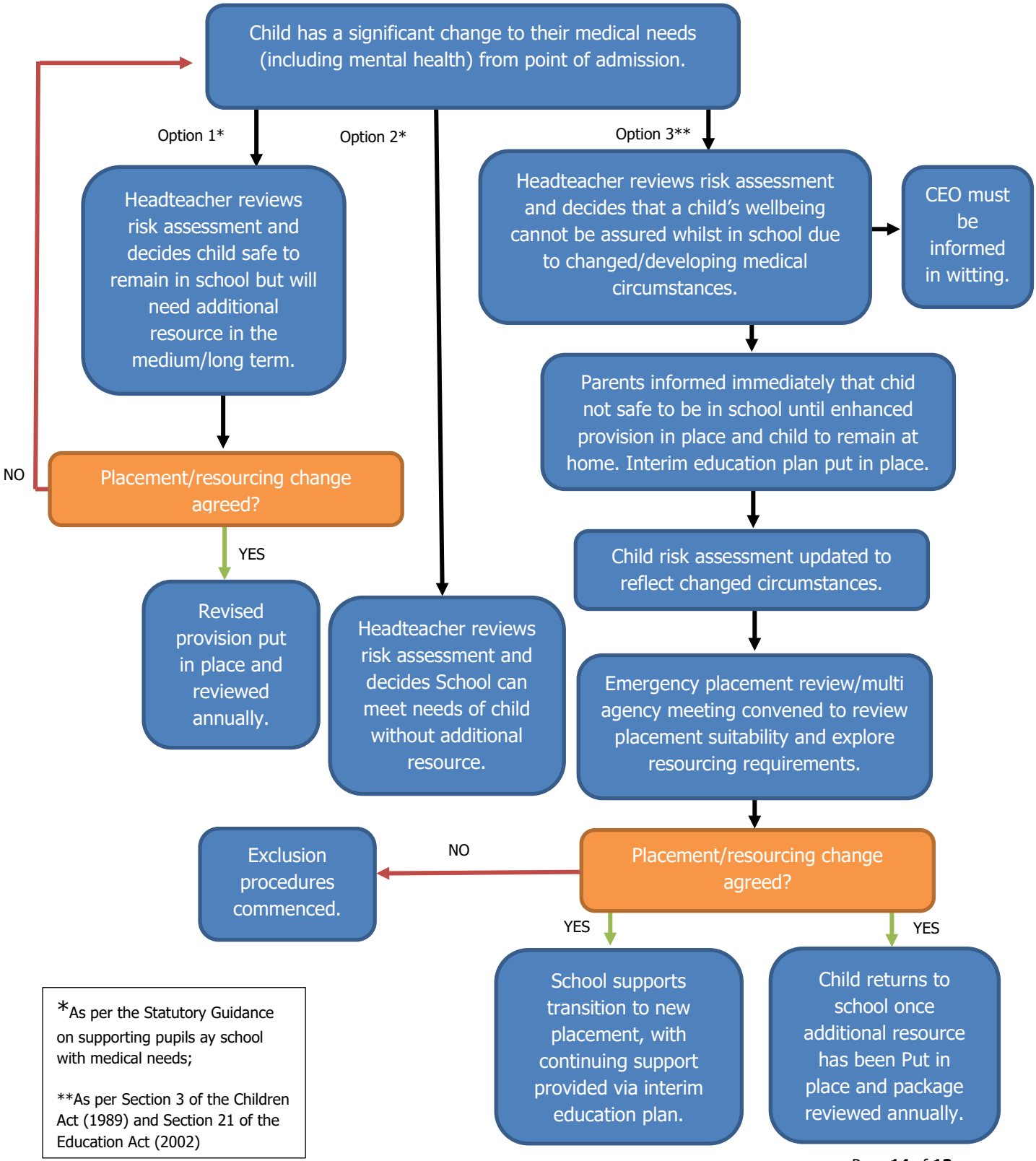
14.2. We will complete an audit of the academy's safeguarding arrangements at frequencies specified by the Local Safeguarding Children Partnership using the audit tool provided by them for this purpose and in line with section 175 audit requirements.

14.3. An academy senior leadership team will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in child protection arrangements. This work is ultimately overseen by the accounting officer and reported into the Standards Committee of the Trust Board.

14.4. The Trust named Director for Safeguarding publishes an annual statement of assurance at the end of each academic year, commenting on the robustness of safeguarding practice in the Trust.

Appendix A

Decision making process map where there are concerns about a child's wellbeing at school due to their medical needs



*As per the Statutory Guidance on supporting pupils ay school with medical needs;

**As per Section 3 of the Children Act (1989) and Section 21 of the Education Act (2002)