

DOWNHAM MARKET  
ACADEMY



# Safeguarding & Child Protection Policy

**2024-2025**

<b>Ratified by Governors</b>	
<b>Due for review</b>	July 2025

## Document Control

New Version Number	Key changes from previous version	Date of Ratification
V1.1	Throughout: DfE Keeping Children Safe in Education 2024 Working together to Safeguard Children 2023 Update dDSL (deputy DSL) to aDSL (alternate DSL)	
	1.3 added: any form of discrimination and child on child abuse and that concerns around mental health, serious violence, online safety, risky behaviours, multiple suspensions from school and risks of permanent exclusion from school are taken seriously by all staff	
	2.6. additions: Added information from of 'Keeping Children Safe in Education 2024 has a mental health need; organised crime groups or county lines; has experienced multiple suspensions, is at risk of being permanently excluded from schools, and in Alternative Provision; clarification: is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage; in relation to the impact on children from seeing, hearing and experiences the effects of domestic abuse.	
	3. removed Michael Jack and Added Becky Hawksbee	
	6.12 updated link for Harbour Centre	
	6.28 <b>Safeguarding responses to children who are absent from education</b> At Downham Market Academy and Athena Sixth Form College we adhere to the ' <a href="#">Working Together to Improve School Attendance</a> ' (2024) guidance. All staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, or for prolonged periods, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.	
	6.29 We understand we remain responsible for the safeguarding of all pupils who are placed in an alternative provision	
	13.3 Addition At Downham Market Academy all concerns are recorded 'Confide' by the DSL or the Acting Head of School only. The Acting Head of School will discuss and confirm actions with the Trust Safeguarding Lead (DCEO) and the Acting Head of School will direct the DSL and members of the senior leadership team on appropriate actions.	
	Updated Appendix 2.	
	14. STATUTORY FRAMEWORK updated all guidance	

# **SCHOOL AND SIXTH FORM COLLEGE POLICY FOR SAFEGUARDING INCORPORATING CHILD PROTECTION**

## **Downham Market Academy and Athena Sixth Form College**

### **Policy Consultation & Review**

This policy is available on our Academy and Sixth Form College websites and is available on request from the main receptions. We also inform parents and carers about this policy when their children join the Academy and Sixth Form College.

We recognise the expertise our staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis and we therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

The policy is provided to all staff at induction alongside our ELA code of conduct for adults, DMA behaviour policy and the safeguarding response to those pupils who are missing from education and roles of the designated safeguarding lead which are both contained in this policy. In addition, all staff are provided with DfE 'Keeping Children Safe in Education' 2024. All staff will read the whole version of this document.

This policy will be reviewed in full by the Governing Body on an annual basis. This policy was last reviewed and agreed by the Governing Body in July 2024. It is due for review in July 2025.

## 1. PURPOSE & AIMS

- 1.1 The purpose of Downham Market Academy and Athena Sixth Form College's safeguarding policy is to ensure every student at our school and Sixth Form College is safe and protected from harm. This means we will always work to:
- Protect children and young people at our school and Sixth Form College from maltreatment;
  - Prevent impairment of our students' mental and physical health or development;
  - Ensure that students at our school and Sixth Form College grow up in circumstances consistent with the provision of safe and effective care;
  - Undertake that role so as to enable students at our school and Sixth Form College to have the best outcomes.
- 1.2 At Downham Market Academy and Athena Sixth Form College we understand that safeguarding is everyone's responsibility, and our approach is child centred and is always in the best interest of the child.
- 1.3 At Downham Market Academy and Athena Sixth Form College we have a contextual approach to safeguarding and ensure that there is a zero tolerance of sexual violence and harassment, any form of discrimination and child on child abuse and that concerns around mental health, serious violence, online safety, risky behaviours, multiple suspensions from school and risks of permanent exclusion from school are taken seriously by all staff
- 1.4 This policy will give clear direction to staff, volunteers, governors, visitors, and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of students at our school and Sixth Form College.
- 1.5 Our Academy and Sixth Form College fully recognises the contribution it can make to protect our students from harm and supporting and promoting the welfare of all students at our school and Sixth Form College. The elements of our policy are prevention, protection, and support.
- 1.6 We recognise that our safeguarding responsibilities are clearly linked to our responsibilities for ensuring that appropriate safeguarding responses are in place for children who are absent from school and Sixth Form College or who go missing from education, particularly on repeat occasions. The Designated Safeguarding Lead (DSL) will meet regularly with the Pastoral Leads and members of the Senior Leadership Team responsible for attendance and the Sixth Form College as well as the Attendance Officer to discuss all persistently absent pupils and those who at risk of being missing in education, abuse, exploitation and neglect including child on child and online abuse. In line with the 'Ofsted Review of sexual abuse in school and colleges' we ensure that robust systems are in place for raising the awareness of sexual misconduct through RHSE, that relevant research and training is in place for all staff and governors, that reporting is prompt and vigorous, that recording of any reported incidences is precise, factual and non-judgemental and finally that we respond to any reports of sexual violence or harassment with the meaningful and severe sanctions and reviews are put in place to reduce the risk of future harm.
- 1.7 This policy applies to all students, staff, parents, governors, volunteers and visitors.

## 2. OUR ETHOS

- 2.1 The student's welfare is of paramount importance. Our Academy and Sixth Form College will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and feel safe. All students and staff at the Academy and Sixth Form College are consulted on the Academy and Sixth Form College ethos. Students at our Academy and Sixth Form College will be able to talk freely to any member of staff at our Academy and Sixth Form College if they are worried or concerned about something.
- 2.2 Everyone who comes into contact with students and their families has a role to play in their safeguarding. We recognise that staff at our Academy and Sixth Form College play a particularly important role as they are in a position to identify concerns early and provide help and support to prevent concerns from escalating. All staff are advised to maintain an attitude of **'it could happen here'** and **'see it, hear it, believe it, and do something'** where safeguarding is concerned. When concerned about the welfare of a student, staff members must always act in the best interests of the student.
- 2.3 All staff, governors and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a student and how to record and report this information promptly and appropriately. Students are aware that staff must act on any disclosures where there is any concern about their safety.
- 2.4 Throughout our curriculum we will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our students to develop essential life skills. This is embedded within schemes of learning across the curriculum (where relevant) but will be explicitly covered through our RHSE work. We teach students about how to stay safe including online, identifying risks and how and when to seek support. At Downham Market Academy and Athena Sixth Form College we achieve this by way of small group tutorials; assemblies led by Academy and Sixth Form College staff and local experts including members of the Safer School Partnership and Sixth Form Colleges support team; dedicated computing lessons and one to one support where needed.
- 2.5 At all times we will work in partnership with our multi-agency partners and endeavour to establish effective working relationships with parents, carers, and colleagues from other agencies in line with Working Together to Safeguard Children (2023) and Norfolk Multi Agency Safeguarding Partnership procedures.
- 2.6 As part of our responsibilities for safeguarding and promoting the welfare of children, we will provide a co-ordinated offer of early help when additional needs of children are identified. These may include if a child:
- is disabled and has specific additional needs;
  - has special educational needs (whether or not they have a statutory education, health and care plan);
  - has a mental health need;
  - is a young carer;
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
  - is frequently missing/goes missing from care or from home;

- has experienced multiple suspensions, is at risk of being permanently excluded from schools, and in Alternative Provision;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- have seen, heard and has experienced the effects of domestic abuse;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

### 3. ROLES AND RESPONSIBILITIES

Role	Name	Contact details	
		Phone (01366)	Email
Designated Safeguarding Lead (DSL)	Sue Campbell	389164	<a href="mailto:scampbell@dma.tela.org.uk">scampbell@dma.tela.org.uk</a>
Deputy Designated Safeguarding Lead (dDSL) Mental Health Lead	Kirsty Ward	389100	<a href="mailto:kward@dma.tela.org.uk">kward@dma.tela.org.uk</a>
aDSL (Designated Safeguarding Officer) Responsibility for Safer recruitment and single central record	Natalie Paine Acting Head of School	389140	<a href="mailto:npaine@dma.tela.org.uk">npaine@dma.tela.org.uk</a>
aDSL	Jake Lawrence (SENDCo and CiC) Lewis Swatman Becky Hawksbee	389100	<a href="mailto:jlawrence@dma.tela.org.uk">jlawrence@dma.tela.org.uk</a> <a href="mailto:lswatman@dma.tela.org.uk">lswatman@dma.tela.org.uk</a> <a href="mailto:bhawksbee@dma.tela.org.uk">bhawksbee@dma.tela.org.uk</a>

Safeguarding Administrator	Kirsty Lipscomb-Cook	389	<a href="mailto:klipscomb-cook@dma.tela.org.uk">klipscomb-cook@dma.tela.org.uk</a>
Safeguarding Governor	Kate Lilley	Via the clerk to the Governors:	
Chair of Governors	Jonathan Webster	Kate Coupland <a href="mailto:ltodd@ccc.tela.org.uk">ltodd@ccc.tela.org.uk</a>	

3.1 It is the responsibility of every member of staff, governor, volunteer and regular visitor to our school and Sixth Form College to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the students at this Academy and Sixth Form College. This includes the responsibility to provide a safe environment in which children can learn.

### **The Governing Body**

3.2 The Governing Body of Downham Market Academy and Athena Sixth Form College is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Governing Body takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named governor who champions safeguarding within the school and Sixth Form College.

3.3 The Governing Body will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our Academy and Sixth Form College website and has been written in line with Local Authority guidance and the requirements of the Norfolk Safeguarding Children Board policies and procedures.
- The Academy and Sixth Form College contributes to inter-agency working in line with Working Together to Safeguard Children (2023)
- A senior member of staff from leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is at least one deputy DSL who is appropriately trained member to deal with any issues in the absence of the Designated Safeguarding Lead (DSL). There will always be cover for this role. The role will be evidenced explicitly in the role holder's job description.
- All staff receive a safeguarding induction and are provided with a copies, of this policy, the Keeping Children Safe in Education (KCSIE) 2024, the ELA code of conduct for adults, the behaviour policy and the Academy and Sixth Form College's safeguarding response for those pupils who go missing from education as detailed section 6 of this policy.
- All staff and governors undertake appropriate child protection training that is updated annually alongside weekly 'little and often' safeguarding training and on-line safety training.
- Procedures are in place for dealing with allegations against members of staff and volunteers in accordance with the requirements of DfE 'Keeping Children Safe in Education' (KCSIE 2024).

- Safer recruitment practices are followed in accordance with the requirements of DfE 'Keeping Children Safe in Education (KCSIE)' 2024
- This policy includes detailed information on the procedures and processes to follow regarding sexual violence and sexual harassment and child on child abuse, the recognition of it and the different forms it may take.
- They remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.

3.4 The governing body will receive regular safeguarding reports that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the Academy and Sixth Form College. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual students.

### **The Acting Head of School**

3.5 At Downham Market Academy and Athena Sixth Form College the Acting Head of School is responsible for:

- Identifying a senior member of staff from leadership team to be the Designated Safeguarding Lead (DSL);
- Identifying alternate members of staff to act as deputy DSLs in their absence to ensure there is always cover for the role.
- Ensuring that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.
- Liaise with the LADO in the event of an allegation of abuse being made against a member of staff or volunteer.

### **The Designated Safeguarding Lead (DSL)**

3.6 The Designated Safeguarding Lead is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child protection within our Academy and Sixth Form College. The DSL will carry out their role in accordance with the responsibilities outlined in Annex C of 'Keeping Children Safe in Education' 2024.

3.7 The DSL and alternate Designated Safeguarding Leads (aDSLs) will provide advice and support to other staff on student welfare and child protection matters. Any concern for a child's safety or welfare will be recorded referred to the DSL and safeguarding team using 'My concern'.

3.8 During term time the DSL and aDSL will always be available (during Academy and Sixth Form College hours) for staff in the Academy and Sixth Form College to discuss any safeguarding concerns. If in exceptional circumstances, a DSL is not available on the Academy and Sixth Form College site in person, we will ensure that they are available via telephone and/or any other relevant media.

3.9 The DSL or aDSL or other member of safeguarding team at Downham Market Academy and Athena Sixth Form College will represent our Academy and Sixth Form College at child protection conferences and core group meetings. Through appropriate training, knowledge and experience our DSL will liaise with Children's Services and other agencies where necessary, and make



referrals of suspected abuse to Children's Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of children.

- 3.10 The DSL and aDSLs will maintain records and child protection files using 'My Concern' ensuring that they are kept confidential and stored securely.
- 3.11 The DSL is responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained within the Academy and Sixth Form College that may use parts of the school and Sixth Form College's safeguarding training pack provided by Children's Services.
- 3.12 The DSL will obtain details of the Local Authority Personal Advisor appointed to guide and support a child who is a care leaver.
- 3.13 We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. The DSL will use the information that they hold about children with a social worker to make decisions in the best interests of the child's safety, welfare and help promote educational outcomes. The DSL will ensure that staff know who these children are; understand their academic progress and attainment and maintain a culture of high aspirations for this cohort. The DSL will support teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these students.

#### **4. TRAINING & INDUCTION**

- 4.1 When new staff or governors join our Academy and Sixth Form College they will be informed of the safeguarding arrangements in place. They will be given a copy of the Academy and Sixth Form College's Safeguarding Policy along with the ELA code of conduct for adults, a copy of 'Keeping Children Safe in Education' 2024 and made aware of the role of the DSL and who our Designated Safeguarding Lead (DSL) and aDSLs are. They will also receive a copy of the DMA Behaviour policy, the ELA Code of conduct for staff and the school and Sixth Form College's response to children who go missing from education – this information is included in section 6 of this policy. All staff will read these key documents. They will also be provided with secure and personal access to the Academy and Sixth Form College's online safeguarding recording platform, "My Concern" and they will be given training on how to complete referrals.
- 4.2 Every new member of staff or volunteer will receive safeguarding training during their induction period within one week of joining the Academy and Sixth Form College. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a student, how to record, the processes for referral to Children's Services and the statutory assessments under Section 17 and Section 47 as well as the remit of the role of the Designated Safeguarding Lead (DSL). The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability to work with children. Staff will also receive on-line safety training as this is part of the overarching safeguarding approach of our school and Sixth Form College.

- 4.3 In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in 'Keeping Children Safe in Education' 2024. In order to achieve this, we will ensure that:
- all members of staff will undertake appropriate safeguarding training on at least an annual basis, and we will evaluate the impact of this training.
  - all staff members receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
  - all staff members have direct access to safeguarding information and referral processes, including those for direct referrals, via a noticeboard in the staff room.
- 4.4 All regular visitors, temporary staff and volunteers to our school and Sixth Form College will be given a set of our safeguarding procedures; they will be informed of whom our DSL, DDSL and aDSLs are and what the recording and reporting system is. (See Appendix 1). This will be via a written summary provided to them before they have any contact with pupils.
- 4.5 The DSL, DDSL and aDSLs who may be in a position of making referrals or attending child protection conferences or core groups will attend one of the multi-agency training courses organised by Norfolk Safeguarding Children's Board at least once every three years. The DSL and Deputy DSL will attend Designated Safeguarding Lead (DSL) training provided by the Local Authority every two years. In addition to formal training, the DSL will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role. This will be via the weekly e-courier bulletin, Early Help hub bulletins and collaboration between school and Sixth Form Colleges within the wider Trust. Any relevant information that is new or updated will be disseminated to the DSOs and whole staff via email, staff meetings or on the safeguarding noticeboard in the staff room.
- 4.6 Our governing body will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children at our school and Sixth Form College. Training for Governors to support them in their safeguarding role is available from Norfolk Governor Services.
- 4.7 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, of 'Keeping Children Safe in Education' 2024 provides links to guidance on specific safeguarding issues such as Sexual Violence and Harassment, Child on child abuse, online abuse, Child Exploitation and Female Genital Mutilation. In addition, local guidance can be accessed via Norfolk Safeguarding Children Board and within the Safeguarding Section of the Norfolk School and Sixth Form Colleges website.
- 4.8 We recognise the importance of all staff understanding the importance of filtering and monitoring online activity on Academy devices and network. Alongside Trust and Academy IT filtering and monitoring processes all staff are responsible for raising a concern in regard to any inappropriate online activity they observe or are made aware of.

## **5. PROCEDURES FOR MANAGING CONCERNS**

- 5.1 Downham Market Academy and Athena Sixth Form College adheres to child protection procedures that have been agreed locally through the Norfolk Safeguarding Children Partnership. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with Norfolk Local Assessment Protocol and the Norfolk Threshold Guidance.

- 5.2 Every member of staff and governor including volunteers working with children at our Academy and Sixth Form College are advised to maintain an attitude of **'it could happen here'** and **'see it, hear it, believe it, do something'** where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to act as outlined in this policy.
- 5.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy immediately to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.
- 5.4 It is not the responsibility of Academy and Sixth Form College staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 5.5 The Designated Safeguarding Lead (DSL) and deputy DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our Academy and Sixth Form College. Any member of staff or visitor to the Academy and Sixth Form College who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or an alternate deputy DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.
- 5.6 All concerns about a child or young person should be reported without delay and recorded in writing using the online safeguarding platform "My Concern" ([www.myconcern.co.uk](http://www.myconcern.co.uk))
- 5.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from the Norfolk Children's Advice and Duty Service (CADS) as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.
- 5.8 All referrals will be made in line with Norfolk Children's Services procedures as outlined in Appendix 2.
- 5.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Norfolk CADS immediately. Anybody can make a referral in these circumstances. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Acting Head of School. Concerns should always lead to support for the student at some point.
- 5.10 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Norfolk CADS, or the police if:
- the situation is an emergency and the DSL, deputy DSL and the Acting Head of School are all unavailable

- they are convinced that a direct report is the only way to ensure the student's safety.

5.11 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Acting Head of School or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point should contact Norfolk CADS directly with their concerns.

## **6. SPECIFIC SAFEGUARDING ISSUES**

### **Contextual safeguarding**

6.1 At Downham Market Academy and Athena Sixth Form College we recognise that safeguarding incidents and/or behaviours can be associated with factors outside of the school and Sixth Form College environment and/or can occur between students outside of the school and Sixth Form College. This is known as contextual safeguarding. It is key that all school and Sixth Form College staff understand the definition of contextual safeguarding and consider whether students are at risk of abuse or exploitation in situations outside their families. Through training we will ensure that staff and volunteers are aware that extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. When reporting concerns, staff should include as much information and background detail as possible so the DSL can make a referral with a holistic view of the child. This will allow any assessment to consider all the available evidence and the full context of any abuse.

6.2 We recognise that students with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying-without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

6.3 At Downham Market Academy and Athena Sixth Form College we recognise that a previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

6.4 At Downham Market Academy and Athena Sixth Form College we recognise that a child who has suffered or been witness to domestic abuse may have long-term impacts on their health, well-being, development, and ability to learn

### **Child on child abuse, sexual violence and harassment**

6.5 At Downham Market Academy and Athena Sixth Form College we recognise that our students are also vulnerable to sexual, physical, and emotional abuse by their peers or siblings. Abuse

perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important that all staff and volunteers to remember the impact on both the victim of the abuse as well as to focus on the support for the perpetrator exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any student who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to child-on-child abuse; it must never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.

6.6 At Downham Market Academy and Athena Sixth Form College all staff are trained to identify and act on any safeguarding issues that manifest themselves via child-on-child abuse and they recognise that although it is more likely that girls are victims and boys are the perpetrators, but that all child on child abuse is unacceptable and will be taken seriously. This is most likely to include, but may not be limited to:

- Sexual Violence and harassment
- Abuse in intimate relationships between peers
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)  
Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos over social media
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is criminal offence) which involves taking a picture under a person's clothes without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals.

6.7 The DSL will respond to any concerns related to sexual misconduct abuse in line with guidance outlined in 'Keeping Children Safe in Education' 2024 and Ofsted Review of Sexual Abuse in School and Sixth Form Colleges and Colleges 2021.

6.8 At Downham Market Academy and Athena Sixth Form College we respond to all reports and concerns of child-on-child sexual violence and sexual harassment.

6.9 We recognise that sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of students sexually assaulting or sexually harassing a single student or groups of students. It can occur online, face to face (physically and verbally) and is never acceptable.

6.10 At Downham Market Academy and Athena Sixth Form College all staff are advised to maintain the attitude of 'it could happen here' and 'see it, hear it, believe it and do something'

6.11 We recognise that by addressing inappropriate behaviour, even if relatively innocuous, we can prevent problematic, abusive and /or violent behaviour in the future

6.12 Whilst any report of sexual violence and sexual harassment is taken seriously, staff are aware that it is more likely that girls are victims of sexual violence and harassment and more likely that it is perpetrated by boys.

6.13 As part of the Eastern Learning Alliance we use the Trust PSHE programme, the [Eastern Learning Alliance Child on child abuse Framework](#), and staff training which supports schools in preventing and reducing sexual violence and harassment and responding to incidents. In regard to dealing with sexual misconduct and staff, students, parents and governors are aware of the **5Rs** approach to dealing with these concerns

**R - Relationship**, Health and Sex Education (together for children) delivered through our PSHE curriculum

**R - Research** and Training to ensure that all staff are trained appropriately to recognise, accept and report incidences of sexual misconduct. This will also enable staff to develop their knowledge.

**R - Reporting** to ensure that reporting is robust and prompt ensure the wishes and feelings of the victim is understood and acted on

**R – Recording** of incidences are accurate and complete and forwarded to the appropriate DSLs in the Academy and Sixth Form College and in the Alliance

**R –Responding and reviewing** to ensure that there is a zero-tolerance approach to the sanctioning of the incidences in line with our behaviour policy. Reviews of incidences are in place to ensure that current procedures are fit for purpose. Regular reviews report of sexual misconduct re completed and analysis to ensure that the PSHE curriculum is relevant and productive in ensuring that all students are aware if they are sexually assaulted or harassed.

- 6.14 We will work with other agencies as required to respond to concerns about sexual violence and harassment. We will seek consultations where there are concerns or worries about developmentally inappropriate or harmful sexual behaviour from the Harmful Sexual Behaviour (HSB) Team as required so that we ensure we are offering the right support to the student. Support will depend on the circumstances of each case and the needs of the victim and perpetrator/s, it may include completion of risk assessments to support students to remain in school and Sixth Form College whilst safeguarding other students and the victim, delivery of early intervention in respect of HSB and/or referral to The [Harbour Centre](#) where a student discloses a rape, an attempted rape or a serious sexual assault whether this has happened recently or in the past. The assault does not have to have taken place in Norfolk but the victim must live in Norfolk to access support. The SARC also has a 24/7 helpline 01603 276381 if pupils or staff need to speak to a Crisis Worker for help & advice. Referral forms can be found on The Harbour Centre website. The victim’s wishes and feelings will always be taken into account.
- 6.15 At Downham Market Academy and Athena Sixth Form College we promote our systems for reporting and dealing with child-on-child abuse through regular information sharing in assemblies and personal development and through our RHSE curriculum.
- 6.16 At Downham Market Academy and Athena Sixth Form College we accept that no reported incidence of child-on-child abuse does not mean that incidents are not happening and we will continue to support students to identify what child on child abuse is and to feel comfortable in reporting incidents to members of staff.
- 6.17 At Downham Market Academy and Athena Sixth Form College we minimise the risk of child-on-child abuse by ensuring that our students are aware that we will act promptly and on incidences and involve outside agencies when appropriate. The recording of incidence on ‘My Concern’ and also student records ensures that patterns of behaviour are identified and acted upon.
- 6.18 All students whether victims, perpetrators or witnesses of child-on-child abuse are supported by the pastoral teams, by outside providers, by the family support process, the safer schools partnership or where appropriate social care and or police.
- 6.19 All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child-on-child abuse. The DSL will respond to any concerns related to child-on-child abuse in line with guidance outlined in ‘Keeping Children Safe in Education’ 2024 and Ofsted Review of Sexual Abuse in School and Colleges 2021. We will ensure that all concerns, discussions, and decisions reached are clearly recorded and any identified actions are followed up.

6.20 All staff will understand that they should follow our safeguarding procedures for reporting a concern if they are worried about child-on-child abuse. The DSL will respond to any concerns related to child-on-child abuse in line with guidance outlined in 'Keeping Children Safe in Education' 2024 and Ofsted Review of Sexual Abuse in School and Colleges 2021. We will ensure that all concerns, discussions, and decisions reached are clearly recorded and any identified actions are followed up.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): County Lines**

6.21 At Downham Market Academy and Athena Sixth Form College we train staff to recognise that both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

6.22 At Downham Market Academy and Athena Sixth Form College we recognise that Child Sexual Exploitation is a form of child sexual abuse, and this imbalance of power coerces, manipulates or deceives a child or young person 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. Child sexual exploitation does not always include physical contact, it can also occur through the use of technology.

6.23 At Downham Market Academy and Athena Sixth Form College we understand that 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 and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs. If a child is suspected to be at risk of or involved in county lines, a referral to the Children's Advice and Duty Service (CADS) will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

### **'Honour-abuse' (including Female Genital Mutilation and Forced Marriage)**

6.24 At Downham Market Academy and Athena Sixth Form College we recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

6.25 Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to



report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: Mandatory Reporting of Female Genital Mutilation-procedural information Home Office (December 2015)

6.26 At Downham Market Academy and Athena Sixth Form College we recognise that forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered without the full and free consent of one or both parties where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. The Forced Marriage Unit has statutory guidance and multi-agency guidelines and can be contacted for advice or more information: 020 7008 0151 or [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk)

### **Preventing radicalisation and extremism**

6.27 We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. At Downham Market Academy and Athena Sixth Form College, we will ensure that:

- Through training, staff, volunteers, and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in the Academy and Sixth Form College and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our Academy and Sixth Form College by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our Academy and Sixth Form College for any concerns relating to radicalisation and extremism.
- The DSL will make referrals in accordance with Norfolk Channel procedures and will represent our Academy and Sixth Form College at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils.

### **Safeguarding responses to children who are absent from education**

6.28 At Downham Market Academy and Athena Sixth Form College we adhere to the '[Working Together to Improve School Attendance](#)' (2024) guidance. All staff should be aware of the safeguarding responsibilities for children who are absent from education, particularly on repeat occasions, or for prolonged periods, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of them going missing in future.

### **Safeguarding responses to children who go missing**

6.29 At Downham Market Academy and Athena Sixth Form College all staff should be aware of the safeguarding responsibilities for children who are missing education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

At Downham Market Academy and Athena Sixth Form College we adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who missing:

- An attendance register is taken at the start of the first session of each Academy and Sixth Form College Day and once during the second session;
- We make every effort to contact parents and carers and follow up with the emergency contacts held.
- We hold at least two emergency contact numbers for each of the pupils on our roll wherever possible.



- Staff will alert DSOs to any concerns raised regarding children who are absent from the Academy and Sixth Form College.
- The DSL meets regularly with the Attendance Officer, SENCo, Safer School and Sixth Form Colleges Officer and other members of the pastoral team to ensure that each response is thorough and takes into account all the relevant information about individual children.
- We will follow the procedures outlined in our attendance policy including undertaking first day calling and monitoring data to ensure we intervene early in cases of poor attendance and/or unexplained absences.
- When removing a student from roll at the standard and non-standard transition points we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files.
- We understand we remain responsible for the safeguarding of all pupils who are placed in an alternative provision.

At Downham Market Academy and Athena Sixth Form College we will consult with the Safer School and Sixth Form Colleges Officer at the Academy and Sixth Form College who may undertake joint home visits and access other information not available to Academy and Sixth Form College staff. Attendance panel meetings with parents/carers will be organised and details of these conversations will be recorded and retained. This will follow a formal process of staged letters that alert parents to our concerns regarding the attendance of a pupil. Where a child does not attend the Academy and Sixth Form College and we do not receive notification of the absence, we will endeavour to contact the parent/carer and where this is not successful, we will conduct a home visit. If the whereabouts of the child is still not clear, we will contact the Children Missing Education (CME) team at NCC.

## **7. Mental Health**

7.1. At Downham Market Academy and Athena Sixth Form College all staff are made aware, through training, that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Our staff are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

7.2. We understand that where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Therefore, through training, staff are aware of how students' experiences, can impact on their mental health, behaviour, and education. All staff are aware that if they have a mental health concern about a child that is also a safeguarding concern, they should take immediate action by passing the information on to DSL.

7.3. At Downham Market Academy and Athena Sixth Form College we have clear systems and processes in place for identifying possible mental health problems and work with other agencies as required to respond to these concerns. Designated Safeguarding Leads refer to the Mental Health and Behaviour in School and Sixth Form Colleges' DfE guidance for further support and we have a trained Mental Health Lead as part of the safeguarding team.

## **8. Records and information sharing**

- 8.1 If staff are concerned about the welfare or safety of any student at our Academy and Sixth Form College, they will record their concern using the online platform "My Concern" which will automatically sign and date the concern from the referrer's unique login. Concerns should be recorded without delay and if a member of staff believes that the concern is serious and the child is in immediate danger, they should personally speak to the DSL or DSO as well as complete the online referral process.
- 8.2 Any new referrals from September 2018 will be stored securely on the "My Concern" electronic cloud. Historic information on safeguarding concerns will either be scanned in or attached to the "My Concern" profile or be kept in a separate named file, in a secure cabinet and not with the child's academic file. Both electronic and paper files will be the responsibility of the DSL. Child protection information will only be shared within the Academy and Sixth Form College based on 'need to know in the child's interests' and on the understanding that it remains strictly confidential.
- 8.3 The "My Concern" online platform will allow trends or patterns in safeguarding concerns to be easily identified for individuals or groups of students at the Academy and Sixth Form College and we can then act as appropriate. This could include specific referrals for support for individuals or tailoring our PSHE curriculum to support groups of students.
- 8.4 Child protection information will only be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here. All our safeguarding files will include a chronology, contents front cover and will record significant events in the child's life.
- 8.5 When a child leaves the Academy and Sixth Form College, the DSL will contact the DSL at the new school and Sixth Form College and will ensure that the child protection file is forwarded to the receiving school and Sixth Form College within 5 days in line with KCSIE 2024. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and Sixth Form College and/or evidence of recorded delivery. Where a parent elects to remove their child from the Academy and Sixth Form College roll to home educate, the Academy and Sixth Form College will decide to pass any safeguarding concerns to the [Services to Home Educators Team](#) within Norfolk County Council.

## **9. WORKING WITH PARENTS & CARERS**

- 9.1 Downham Market Academy and Athena Sixth Form College is committed to working in partnership with parents/carers to safeguard and promote the welfare of students and to support them to understand our statutory responsibilities in this area.
- 9.2 When new students join our Academy and Sixth Form College, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the Academy and Sixth Form College website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Services.
- 9.3 We are committed to working with parents positively, openly, and honestly. We ensure that all

parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a student from harm.

9.4 We will seek to share with parents any concerns we may have about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the Academy and Sixth Form College has about a child will not prevent the DSL making a referral to Children's Services in those circumstances where it is appropriate to do so.

9.5 To keep children safe and provide appropriate care for them, the Academy and Sixth Form College requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.
- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above).
- Full details of any other adult authorised by the parent to collect the child from the Academy and Sixth Form College (if different from the above).

The Academy and Sixth Form College will retain this information on the pupil file. The Academy and Sixth Form College will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the Academy and Sixth Form College has been supplied with the adult's full details in writing.

9.6 At Downham Market Academy and Athena Sixth Form College we are working in partnership with Norfolk Constabulary and Norfolk Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. To achieve this, Norfolk Multi-Agency Safeguarding Hub will share police information of all domestic incidents where one of our pupils has been present with DSL. On receipt of any information, the DSL will decide on the appropriate support the child requires, this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance with the 'Norfolk Joint Agency Protocol for Domestic Abuse – Notifications to School and Sixth Form Colleges'. We understand that domestic abuse has its long-term impact on a child's health, well-being, development, and ability to learn – reflecting the Domestic Abuse Act 2021 and will act accordingly. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

## **10. CHILD PROTECTION CONFERENCES**

10.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

10.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the Academy and Sixth Form College in respect of individual children. Usually, the person representing the Academy and Sixth Form College at these meetings will be the DSL or a aDSL. In any event, the person attending will need to have as much relevant up to date

information about the child as possible; any member of staff may be required to contribute to this process.

- 10.3 All reports for child protection conferences will be prepared in advance using the guidance and template report provided by the Norfolk Safeguarding Children Partnership. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at the Academy and Sixth Form College. To complete such reports, all relevant information will be sought from staff working with the child at the Academy and Sixth Form College.
- 10.4 Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents.

## **11. SAFER RECRUITMENT**

- 11.1 We will ensure that the Acting Head of School and DSL and at least one member of the Governing Body have completed appropriate safer recruitment training. At all times the Acting Head of School and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education', DfE 2024. At least one person involved in conducting an interview will have received safer recruitment training.
- 11.2 At Downham Market Academy and Athena Sixth Form College we will use the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and insist on taking up references prior to interview. We will question the contents of application forms if we are unclear about them, we will undertake Disclosure and Barring Service checks and use any other means of ensuring we are recruiting and selecting the most suitable people to work with our children.
- 11.3 We will maintain a Single Central Register (SCR) of all safer recruitment checks carried out in line with statutory requirements. A senior member of staff will check the SCR regularly to ensure that it meets statutory requirements.
- 11.4 In line with Keeping Children safe in Education 2024 Online searches will be carried out on shortlisted candidates for vacancies at the Academy. Shortlisted candidates will be made aware of this process by the Academy.

## **12. SAFER WORKING PRACTICE**

- 12.1 All adults who encounter our students have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident, and safe to do so.
- 12.2 All staff will be provided with a copy of the ELA code of conduct for adults at induction. They will be expected to know the ELA code of conduct for adults and policy for positive handling and

carry out their duties in accordance with this advice. There will be occasion when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for safe restraint must be adhered to. A list of staff that have accessed Norfolk Steps training will be kept by the Acting Head of School and will be recorded on the single central record.

12.3 If staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts whilst at the Academy and Sixth Form College, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

12.4 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in 'Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings' (May 2019). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

### **13. MANAGING ALLEGATIONS AGAINST STAFF & VOLUNTEERS**

13.1 Our aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our Academy and Sixth Form College. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

13.2 Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children. There may also be circumstances where a member of staff or volunteer is involved in an incident outside of school and Sixth Form College which did not involve children but could have an impact on their suitability to work with children; this is known as transferrable risk.

13.3 At Downham Market Academy all concerns are recorded on 'Confide' by the DSL or the Acting Head of School only. The Acting Head of School will discuss and confirm actions with the Trust Safeguarding Lead (DCEO) and the Acting Head of School will direct the DSL and members of the senior leadership team on appropriate actions.

13.4 We will take all possible steps to safeguard our children and to ensure that the adults in our Academy and Sixth Form College are safe to work with children. We will always ensure that the procedures outlined in Norfolk Safeguarding Children Board Protocol: Allegations Against Persons who Work with Children and 'Keeping Children Safe in Education' 2024 are adhered to and will seek appropriate advice. The first point of contact for school and Sixth Form Colleges regarding LADO issues is via the Local Authority Duty Desk on 01603 307797. A Duty Advisor will give advice and guidance on next steps. If the advice is to make a referral to LADO, then the form should be completed. Direct contact details for the LADO are - e-mail: LADO@norfolk.gov.uk or telephone 01603 223693. See Appendix 3.

13.5 If an allegation is made or information is received about any adult who works in our setting which indicates that they may be unsuitable to work with children, the member of staff receiving

the information should inform the Acting Head of School immediately. This includes concerns relating to agency and supply staff and volunteers. Should an allegation be made against the Acting Head of School, this will be reported to the Chair of Governors. If neither the Acting Head of School nor Chair of Governors is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Acting Head of School or the Vice Chair of Governors.

- 13.6 The Acting Head of School or Chair of Governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.
- 13.7 When using a supply agency, we inform the agency of our process for managing allegations against staff and keep them up to date with any policy developments. Where concerns are raised about an individual and the school and Sixth Form College is not their employer, we recognise that we still have responsibility to ensure allegations are dealt with properly. To achieve this, we will liaise with relevant parties including the LADO to determine a suitable outcome. Whilst the supply agency should be fully involved and co-operate with any enquiries from the LADO, police and/or children's services, we recognise that the school and Sixth Form College will usually take the lead in conducting an investigation as we have direct access to any affected children and other school and Sixth Form College staff to collect the facts.
- 13.8 Any member of staff or volunteer who does not feel confident to raise their concerns with the Acting Head of School or Chair of Governors should contact the LADO directly on 01603 223693. Further national guidance can be found at: [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing). The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – this line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- 13.9 The Academy and Sixth Form College has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our Academy and Sixth Form College, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

### **Concerns that do not meet the harm threshold**

- 13.10 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above. In Norfolk the 'low level' concern process is to consult with the Local Authority Education Duty Desk on 01603 307797. At Downham Market Academy we recognise a low-level concern to be something which is
- inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
  - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 13.11 At Downham Market Academy we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply

teachers, volunteers and contractors) are dealt with promptly and appropriately. Through training, staff are made aware of what low level concerns are and understand the importance of reporting and these types of concerns in writing.

- 13.12 At Downham Market Academy staff report all low-level concerns to the DSL or to the Acting Head of School. If reported to the DSL then the DSL will inform the Acting Head of School of the concern in a timely fashion. The Acting Head of School will always be the ultimate decision maker in respect of all low-level concerns. Should an allegation be made against the Acting Head of School, this will be reported to the DCEO or CEO of the Eastern Learning Alliance. If the allegations is against the DCEO or CEO this should be reported to the Chair of Trustees.
- 13.13 Through training and induction, we ensure that all staff understand the importance of self referring, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- 13.14 At Downham Market Academy we understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely and will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the Local Authority Education Duty Desk on 01603 307797 . Please note, where a child, parent/carers or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified. We will not record Low-level concerns in references unless: The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and or The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.
- 13.15 We recognise that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference
- 13.16 At Downham Market Academy all concerns are recorded on 'Confide' by the DSL or the Acting Head of School only. The Acting Head of School will discuss and confirm actions with the Trust Safeguarding Lead (DCEO) and the Acting Head of School will direct the DSL and members of the senior leadership team on appropriate actions.

## **14. RELEVANT POLICIES**

- 14.1 To underpin the values and ethos of our Academy and Sixth Form College and our intent to ensure that pupils at our Academy and Sixth Form College are appropriately safeguarded the following policies are also included under our safeguarding umbrella:
- ELA code of conduct for adults

- Anti-Bullying
- Behaviour
- Recruitment & Selection
- Whistleblowing
- Attendance
- ESafety
- Supporting students with medical needs
- First aid

## 15. STATUTORY FRAMEWORK

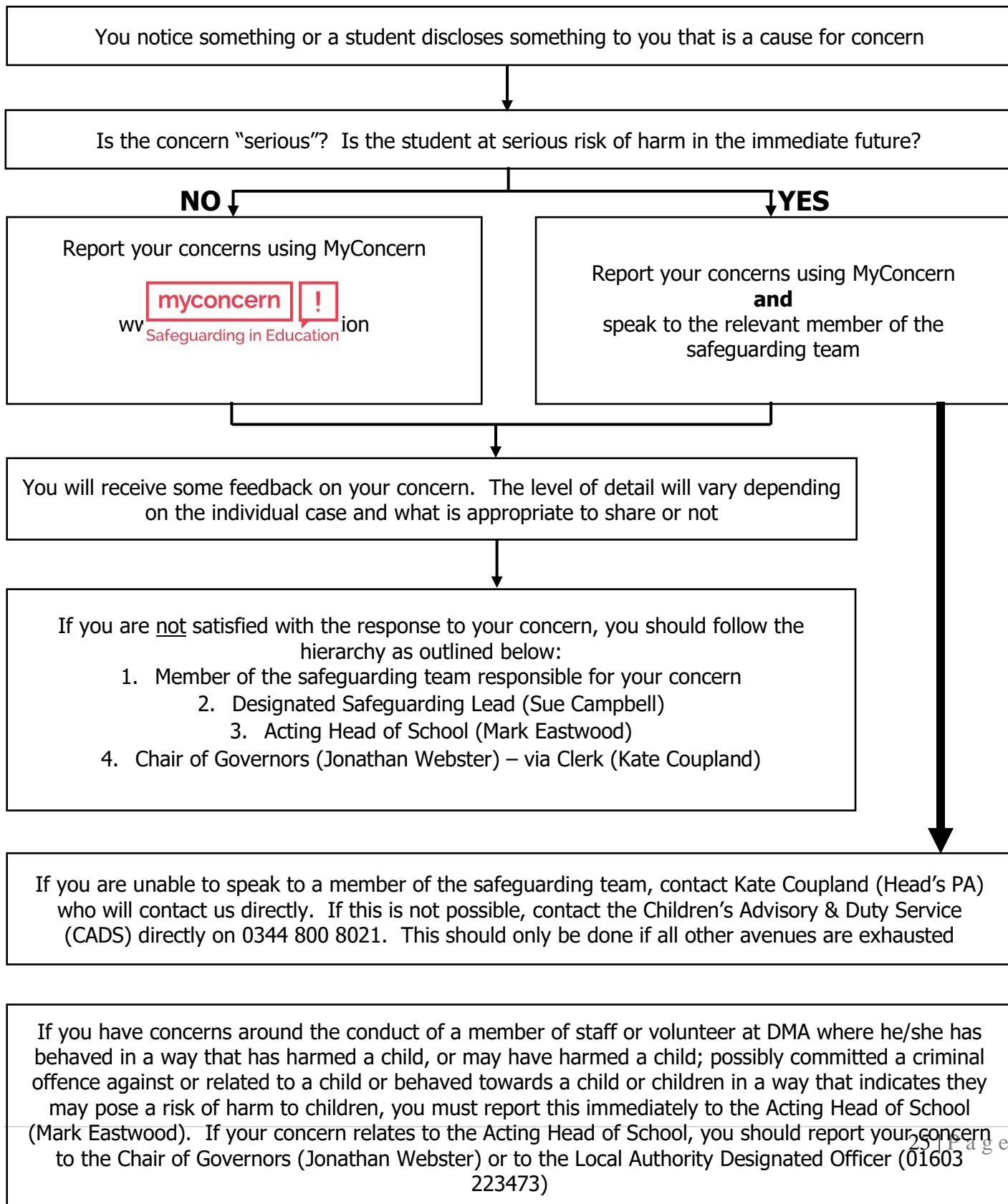
This policy has been devised in accordance with the following legislation and guidance:

- [Working Together to Safeguard Children July 2023](#)
- [Keeping Children Safe in Education DfE 2024](#)
- [Ofsted Review of Sexual Abuse in School and Sixth Form Colleges and Colleges 2021](#)
- [Norfolk Continuum of Need Guidance.](#)
- [Working Together to Improve School Attendance'](#) (2024) guidance.
- [The Prevent duty: Departmental advice for schools and childcare providers](#) DfE (September 2023)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation \(September 2023\)](#)
- [Norfolk Safeguarding Children Partnership procedures](#)
- [Norfolk Safeguarding Children Partnership Protocol: Allegations Against Persons Who Work with Children](#)
- [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings](#) (Feb 2022)
- [Information sharing: advice for practitioners providing safeguarding services](#) DfE (May 2024)
- [The Prevent duty: Departmental advice for schools and childcare providers](#) DfE (September 2023)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation \(September 2023\)](#)
- [Mandatory Reporting of Female Genital Mutilation- procedural information](#) Home Office (January 2020)
- [Multi-agency practice principles for responding to child exploitation and extra-familial harm](#)
- [Teaching online safety in school DfE \(January 2023\)](#)
- [Data protection: toolkit for schools DfE \(April 2024\)](#)
- [Promoting the education of children with a social worker](#) (March 2024)
- [Preventing youth violence and gang involvement](#)
- [Criminal exploitation of children and vulnerable adults: county lines](#)
- [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)
- [Domestic Abuse Act 2021 Statutory Guidance](#) (Home Office April 2023)
  - [Data protection: toolkit for schools DfE \(April 2024\)](#)
- [Behaviour In School Guidance 2022](#)
- [Keeping children safe in out-of-school settings: code of practice](#)
- [What to do if you're worried a child is being abused DfE \(March 2015\)](#)
- [Sexual violence and sexual harassment between children in school and Sixth Form Colleges and colleges DfE \(May 2018\)](#)
- [Child sexual exploitation: guide for practitioners DfE \(February 2017\)](#)
- [Mental Health and Behaviour in School and Sixth Form Colleges DfE \(November 2018\)](#)



## Appendix 1: Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers

**Our Academy will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. If you are concerned about the welfare of a student at the Academy, you must report it...**

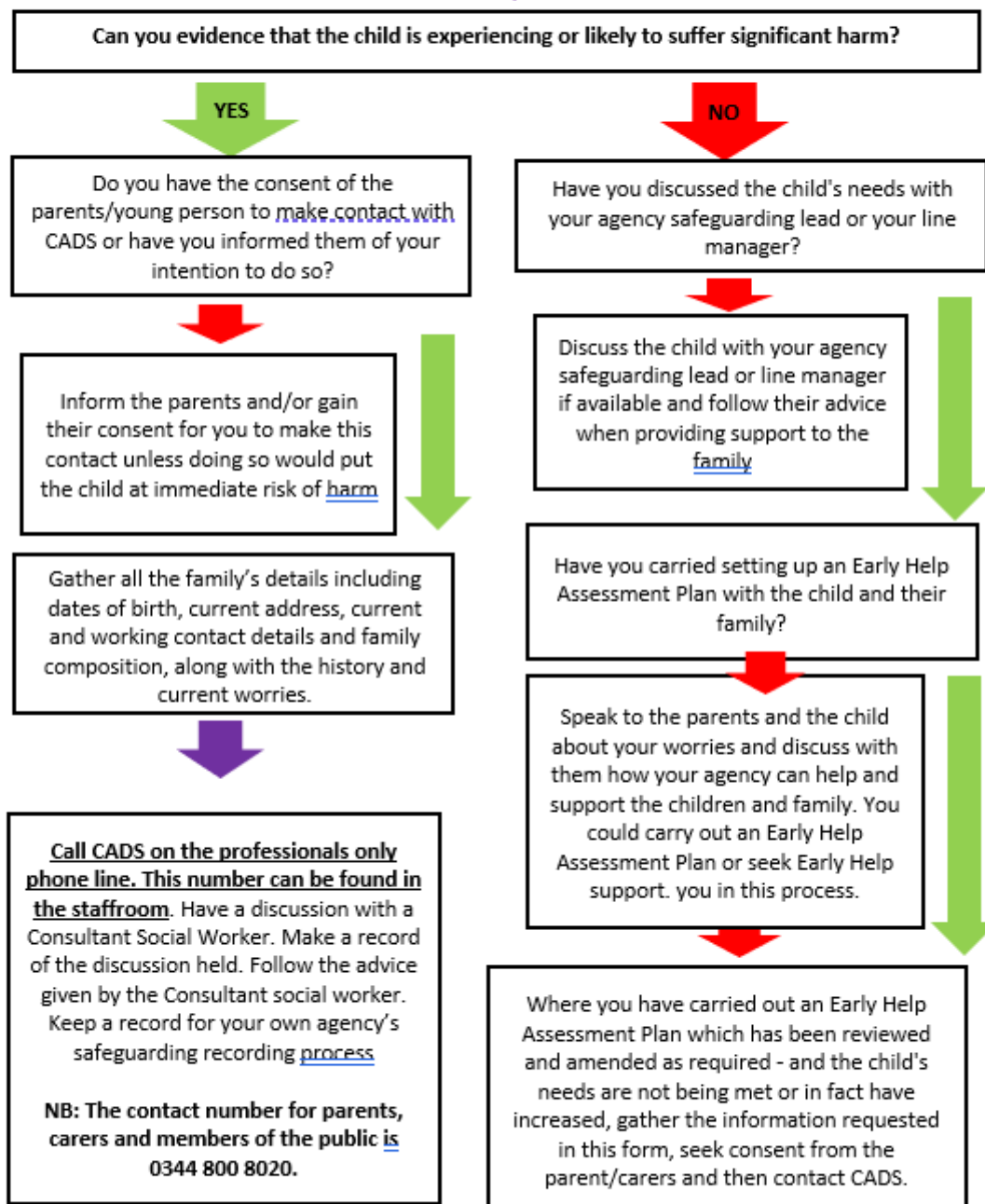


## Appendix 2: Local Safeguarding Referral Procedures



### Appendix 2: Local Safeguarding Procedures Children's Advice and Duty Service- CADS

Before contacting CADS, please answer the following questions and follow the advice provided:



**Appendix 3: Advice for school and Sixth Form Colleges, colleges and alternative education providers where there are concerns about an adult who works within the setting.**

