

ETON ACADEMY

Safeguarding and Child Protection Policy and Procedure

Version Control	
Implementation Date	September 2022
Reviewed	September 2023
Reviewed	January 2024
Next Review	September 2024

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This policy is to be read in conjunction with our E-safety Policy.

1. Safeguarding at Eton Academy

Key Roles	
Designated safeguarding lead (DSL)	Dr Gabrielle Hargreaves gabrielle.hargreaves@eton-academy.net +44 7415341453
Deputy designated safeguarding lead (DDSL)	Danielle Viney-Burton danielle.viney-burton@eton-academy.net +44 7842 703455
Wellbeing Officer	Samantha Tarpey sam.tarpey@eton-academy.net

At Eton Academy, our core focus is on ensuring the safety, well-being (including mental health), and protection of our pupils and students, particularly within the realm of online education. We are dedicated to fostering an environment that is open, secure, nurturing, and supportive for online learning.

We do this by actively educating our pupils and students about personal safety measures in the digital sphere, emphasising the importance of self-protection in an online learning context. Also through implementing robust systems and procedures aimed at safeguarding our pupils and students, with a steadfast commitment to acting in the best interest of each child.

At Eton Academy, we adopt a child-centric approach in all our endeavours. This involves building trust-based relationships with children and young people, always prioritising their best interests.

The safeguarding of pupils, students, and educators in the remote education setting is paramount. Our policy's primary objective is to protect the students we educate online. We focus on prevention, offering support and guidance. In line with governmental recommendations, our policy and practices at Eton Academy ensure that our online educational offerings and remote learning environment are safe, of high quality, and mirror the expectations set in a traditional school setting as closely as possible.

At Eton Academy, we prioritise the safety of our students by conducting comprehensive enhanced DBS checks. This thorough vetting process ensures that only individuals deemed suitable are involved in working with our students.

We are committed to providing our staff with extensive training to identify signs that may indicate abuse. It's crucial that all staff members are well-informed about the procedures for making referrals. Additionally, we maintain clear and effective communication between the school and relevant agencies, especially in situations where referrals are necessary. This approach underscores our dedication to the safety and well-being of our students.

Staff Responsibilities

At Eton Academy, our staff members bear the following critical responsibilities, all aimed at ensuring a secure and nurturing online learning environment for every child:

- **Creating a Safe Learning Space:** Actively contribute to fostering a safe online learning environment where all children can learn and thrive.
- **Responding to Disclosures:** Understand the appropriate actions to take if a child discloses experiences of abuse or neglect.
- **Monitoring Student Behaviour:** Be vigilant and know the steps to take if concerns arise regarding the behaviour or conduct of a student within the school.
- **Addressing Adult Conduct:** Know the procedures to follow if concerns are raised about the behaviour or conduct of any adult (staff or parent) associated with the school.
- **Confidentiality Management:** Handle the requirement to maintain an appropriate level of confidentiality in sensitive situations.
- **Identifying Early Help Needs:** Identify children who may benefit from early intervention services.
- **Referring Concerns:** Promptly refer any concerns to the Designated Safeguarding Lead (DSL) or the Deputy DSL.
- **Understanding Early Help Processes:** Be aware of our UK Early Help process, our role in it, and similar international organisations tasked with child safeguarding.
- **Referral Process Knowledge:** Be familiar with the procedure for making referrals to Children's Social Care and understand the potential role in statutory assessments.

Eton Academy's online platform, Classe365, is designed to be both secure and exclusively accessible to our enrolled pupils/students, their parents, and school staff. To maintain a safe and respectful digital environment, all online students commit to adhering to our acceptable use policy.

Eton Academy recognises that safeguarding covers a broad range of areas and it aims to achieve the following:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health and/or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Enabling children to have optimum life chances, so they can enter adulthood successfully.
- Taking action to enable all children to have the best outcomes.

Safeguarding is everyone's responsibility

At Eton Academy, we recognize that every individual who interacts with children and their families plays a vital role in their well-being. To effectively fulfil this role, it's essential for all professionals to adopt a child-centred approach. This means consistently prioritising the best interests of the child in all actions and decisions.

Understanding that no single professional can completely understand a child's needs and circumstances, it's crucial that everyone who comes into contact with children plays a part in identifying concerns, sharing information, and taking prompt action. Timely and collaborative efforts are key to ensuring children and families receive the appropriate support when they need it.

Scope of the Policy:

- This policy and its procedures apply to all pupils/students at Eton Academy.
- The policy is relevant to all staff, including teaching and non-teaching personnel, pastoral staff, support staff, contract, non-school based staff, and any other adults working at the school.
- The term "staff" or "members of staff" used in this document refers to all the aforementioned groups, unless specified otherwise.
- The term DSL within this document refers to the Designated Safeguarding Lead.

Inter-agencies

Eton Academy is deeply committed to collaborating with various agencies, both within the UK and internationally, to ensure the highest levels of safeguarding for all our students. We actively participate in inter-agency work as per statutory guidelines, collaborating with social care, the police, health services, and other relevant organizations to promote the welfare of children and protect them from harm.

Safeguarding International Students

Given the diverse nature of our student body at Eton Academy, which includes international students, we uphold the same rigorous safeguarding standards for all students, regardless of their location. International students receive safeguarding measures that adhere to what the Department for Education (DfE) defines as Good Practice.

Specific strategies include:

- Eton Academy has the capability to contact the embassies of all countries where our international students reside.
- We are able to reach out to the British consulate and council in regions where our students are located.
- The school maintains contact with various local authorities, including local police and Ministries of Foreign Affairs, in the regions where our students reside.
- Any issues concerning the safety of our students are addressed in accordance with the rules and regulations prescribed by the respective authorities in the countries concerned, ensuring the safety of children.

At Eton Academy, we are keenly aware of the cultural diversity within our community and prioritise sensitive engagement with the unique cultures of our students and their families, especially in relation to safeguarding and child protection. This sensitivity extends to addressing potential risks of harm arising from cultural, faith, and belief-based practices by parents, carers, or the wider community. Our staff are trained to report any concerns about abuse linked to culture, faith, and beliefs with the same level of seriousness as other child protection concerns.

Definitions and Terminology:

'Children' refers to individuals under the age of 18.

'DSL' stands for Designated Safeguarding Lead, the appointed individual at our school responsible for handling safeguarding matters.

'Designated Officer' refers to the individual appointed by the local authority to address allegations made against adults.

'2023' in our context refers to the statutory guidance document titled "Keeping Children Safe in Education."

Related documentation

This policy should be read in relation to the most current version of the following documents: National

documents:

- [The Education \(Independent School Standards\) Regulations April 2019](#)
- [KCSIE Sep 2023](#)
- [Filtering and monitoring standards March 2023](#)
- [Cyber security standard](#)
- [Working together to improve school attendance September 2022](#)
- [Working Together To Safeguard Children 2023](#)
- [Safeguarding and Remote Education - Guidance \(November 2022\)](#)
- [Prevent Duty Guidance: for England and Wales \(April 2021\)](#)
- [Information Sharing Guidance for Safeguarding Practitioners Information Sharing Guidance - DfE July 2018](#)
- [Disqualification under the Childcare Act \(July 2018\)](#)
- [The Equality Act - 2010](#) Equality Act 2010: Guidance Gov UK – Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils/students with certain protected characteristics in order to meet their specific need. SHS could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. There is also a duty to make reasonable adjustments for disabled children and young people.
- [The United Nations Convention on the Rights of the Child \(UNCRC\) United Nations Convention on the Rights of the Child](#)
- [What to do if you are worried a child is being abused – Advice for practitioners \(departmental advice\) \(March 2015\)](#)
- [International Safeguarding Standards](#)

At Eton Academy, our safeguarding policy is subject to an annual review and update, incorporating feedback from our staff. This updated policy is then disseminated to all staff and volunteers, and it is also made publicly available on the school's website.

To ensure robust safeguarding practices, we are committed to the following principles:

- **Integral Role of Teachers and Staff:** Recognize that teachers and other key staff members are essential to the safeguarding process.
- **Universal Responsibility:** Acknowledge that safeguarding students is a priority for every member of staff, without exception.
- **Comprehensive Training:** Ensure all staff are thoroughly trained to identify signs that a student might be at risk of harm. This includes understanding the procedures for reporting suspicions to the appropriate agencies, with a particular focus on the context of online education and home-schooling for both UK-based and International Students.
- **Collaboration with Agencies:** Actively share our concerns with relevant agencies and meticulously record these interactions and the sharing of information.
- **Bullying Prevention:** Vigilantly safeguard against instances of bullying, taking immediate action to stop any bullying that is reported or observed.

In cases where there are suspicions or indications that a child's physical, sexual, or emotional well-being is being compromised, or if there is a concern about neglect or abuse, Eton Academy will strictly follow the procedures outlined in the statutory guidance for schools and colleges. This includes adhering to "Keeping Children Safe in Education (September 2023)" and "Working Together to Safeguard Children (July 2018)" guidelines, especially in instances involving alleged or suspected child abuse.

This policy is based on KCSIE 2023 and any references to national guidance made within this document are in relation to the versions listed above. The school will always refer to the above statutory guidance as the

benchmark for all safeguarding practice and decision making.

Internal documents:

- Behaviour and Exclusion Policy
- E-Safety Policy
- Preventing Extremism and Radicalisation Policy
- Safer Recruitment Policy
- Staff Code of Conduct and Acceptable Use Policy

Safer recruitment

Our school prioritises embedding a culture of safer recruitment as part of our strategy for preventing harm to children. Statutory procedures for checking the suitability of staff and volunteers who work with children are always followed (see Safer Recruitment Policy).

Annual Policy Evaluation

Every year, our school conducts a thorough evaluation of this policy to assess its effectiveness across the institution. This process aims to ensure the comprehensive implementation of these policies within the school environment.

Immediate Action for Improvement

Should any shortcomings or areas for enhancement in our child protection measures be identified, the school commits to promptly addressing these issues. This approach is proactive, prioritising immediate action over waiting for the next scheduled policy review.

Staff Participation and Input

We actively encourage our staff to participate in the development and refinement of our safeguarding procedures. Their insights, based on reflective practice and learning experiences, are invaluable. Staff members are also welcomed to contribute their perspectives to the policy review process.

2. Key Safeguarding Facts

The safety and wellbeing of our pupils is our number one priority

Safeguarding and promoting the welfare of children is everyone's responsibility	We operate within a culture of openness and recognise and accept that abuse can happen in any organisation	We are a 'sharing organisation' All concerns should be reported
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All concerns about a child (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL)

In the event that a child is in immediate danger or at risk of harm, a referral should be made to Children's Social Care and/or the police immediately

An allegation about another adult in school should be referred to the DSL	An allegation about the DSL should be referred to the CEO	Any concern or 'nagging doubt' about an adult or child should be sent to the DSL
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This policy must be read alongside 'Keeping Children Safe in Education' – DFE Statutory Guidance

3. Key people and contacts

School Contacts	
Designated safeguarding lead (DSL)	Dr Gabrielle Hargreaves gabrielle.hargreaves@eton-academy.net
Deputy designated safeguarding lead (DDSL)	Danielle Viney-Burton danielle.viney-burton@eton-academy.net
Digital Safeguarding Lead	Dr Gabrielle Hargreaves
PREVENT Lead	Dr Amira Mohsen a.m@eton-academy.net
Data Protection Officer	Dr Amira Mohsen
Wellbeing Officer	Samantha Tarpey sam.tarpey@eton-academy.net

Local Authority Contacts	
Our school follows the safeguarding protocols and procedures of our Safeguarding Partners	<p>Manchester City Council: 0161 234 5001 mcsreply@manchester.gov.uk</p> <p>Manchester Safeguarding Partnership https://www.manchestersafeguardingpartnership.co.uk/</p> <p>Manchester Contact Centre MSP Business Unit location: Manchester Town Hall Extension Albert Square PO Box 532 Manchester, M60 2LA</p> <p>Telephone: 0161 234 5001 (open 24 hours a day, seven days a week) Email: socialcare@manchester.gov.uk</p>
Allegations against Professionals (LADO)	<p>https://www.manchestersafeguardingpartnership.co.uk/allegations-against-professionals-lado/</p> <p>If you have concerns about an adult working with children or young people please report your concern using the MCC Designated Officer (LADO) Referral Form on the webpage above (FEB 2020)</p> <p>If you wish to have an informal conversation with the MCC Designated Officer before making a referral please call 0161 234 1214.</p> <p>Completed referrals forms should be emailed to qualityassurance@manchester.gov.uk – it is essential that all sections of the referral form are completed.</p>
Local authority Prevent details	<p><u>Manchester City Council</u> Counter Terrorism Policing North West – 0161 856 6362</p> <p>Local Authority Prevent team - prevent@manchester.gov.uk</p> <p>Alternatively contact the police confidentially on the Anti-terrorist hotline 0800 789 321. Report your concerns to channel@gmp.police.uk</p> <p><u>Greater Manchester Police</u> https://www.gmp.police.uk/advice/advice-and-information/t/prevent/prevent/</p> <p>You can also contact the Prevent Team on 0161 8566345.</p> <p>You can also call the national police Prevent advice line 0800 011 3764, in confidence, to share your concerns with our specially trained officers.</p>

UK Police Emergency Number	999
UK Police Non-emergency Number	101

National Contacts	
NSPCC 24/7 Helpline	Tel: 0808 800 5000 Email: help@nspcc.org.uk
NSPCC Text line	88858
NSPCC Childline	Tel: 0800 1111
NSPCC FGM helpline	Tel: 0800 028 3550 Email: fgmhelp@nspcc.org.uk
NSPCC Whistleblowing helpline	Tel: 0800 028 0285 (8am – 8pm) Email: help@nspcc.org.uk
DfE Prevent helpline for schools & parents	Tel: 020 7340 7264 (non-emergency) Email: counter.extremism@education.gsi.gov.uk
The Lucy Faithfull Foundation (LFF)	Tel: 0800 1000 900 Email: help@stopitnow.org.uk www.parentsprotect.co.uk
National Bullying Helpline	Tel: 0845 22 55 787
UK Safer Internet Centre helpline for School Staff	Tel: 0844 381 4772 Email: helpline@saferinternet.org.uk
Internet Watch Foundation hotline for reporting criminal content	www.iwf.org.uk
Educate Against Hate	http://educateagainsthate.com

4. Types of Abuse

The term "abuse" is often used broadly to describe various harmful behaviours. It's important for all staff to recognize the signs of abuse and neglect, as this awareness is key in identifying children who may require assistance or protection. It's essential to understand that issues related to abuse and safeguarding don't typically occur in isolation and cannot be neatly categorised under a single definition. More often, they present complex situations where multiple issues intersect and overlap.

Abuse

Abuse encompasses various forms of child maltreatment. It can occur through direct harm or neglect, happening in different environments, including family, institutional, or community settings. Abuse can be perpetrated by adults or other children and might occur in-person or online.

Domestic Abuse

We recognize that a domestic abuse environment is distressing for children, often leading to further abuse types. Staff are trained to observe signs in students such as aggression, anti-social behaviour, depression, anxiety, poor academic performance, and incomplete homework. Concerns are referred to the DSL for further evaluation and action. Observations during online lessons or reports from parents about potential abuse in other households are immediately reported to the DSL.

Physical Abuse:

This involves causing physical harm through actions like hitting, shaking, throwing, poisoning, scalding, drowning, suffocating or burning. It can also include harm from fabricated or induced illnesses. Indicators of physical abuse include

- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen,
- Respiratory problems from drowning, suffocation or poisoning;
- Untreated or inadequately treated injuries;
- Bruising which looks like hand or finger marks or caused by an implement;
- Cigarette burns, human bites; or
- Scarring, scalds and burns.

Emotional Abuse

Emotional abuse involves a pattern of behaviour that severely impacts a child's emotional growth and development. This type of abuse might manifest as conveying to a child that they are insignificant, unloved, or only of value when meeting others' needs. It can include preventing the child from sharing their thoughts and feelings, intentionally ignoring them, ridiculing their words or communication style. The signs of emotional abuse are generally behavioural rather than physical. These indicators can provide insights into the presence of emotional maltreatment

Sexual abuse

Sexual abuse in children encompasses a range of actions where a child or young person is coerced or persuaded into sexual activities. This may not always involve overt violence and can occur without the child's full awareness of the nature of these actions. Sexual abuse includes activities that involve physical contact, such as sexual assault or other forms of penetration, as well as non-contact behaviors like being forced to view or create sexual images, witnessing sexual acts, being encouraged to act in sexually inappropriate ways, or being groomed for future abuse.

This type of abuse can happen in person or through online platforms, with technology sometimes playing a role in offline abuse. Importantly, perpetrators of sexual abuse are not limited to adult males; females and other children can also be responsible for such acts. In educational settings, the sexual abuse of children by their peers is a specific concern that requires vigilance.

Indicators of sexual abuse in children can vary but may include physical signs such as injuries or discomfort in the genital area, urinary tract infections, difficulty with physical movements, persistent sore throats, and stomach pains. Behavioral changes like anxiety, withdrawal, or aggression can also be signs. In some cases, there might be more overt indicators such as pregnancy or the presence of sexually transmitted infections.

Recognizing these signs is crucial for the timely identification and intervention in cases of sexual abuse, ensuring the safety and well-being of the child.

Neglect

Neglect refers to a consistent failure to fulfill a child's fundamental physical and/or psychological needs, which can significantly impair the child's health or development. This can start as early as during pregnancy due to issues such as maternal substance abuse. After birth, neglect may manifest in various ways, including failing to

provide basic necessities like adequate food, clothing, and shelter; not protecting the child from physical and emotional harm; insufficient supervision; or not ensuring proper medical care. Neglect also encompasses a lack of attention to a child's emotional requirements.

Indicators of neglect can vary, but some common signs include:

- The child appears undernourished or unusually small for their age, or showing a decline in weight.
- The child appears overweight for their age.
- Inadequate or inappropriate clothing for weather conditions.
- Frequent or unexplained absences from school or consistent lateness.
- Regularly being left alone or being responsible for the care of younger siblings.

These signs are important to recognize as they can signal a child in need of assistance and intervention to ensure their well-being and development.

Child-on-child abuse:

All staff must be alert to possible indicators of safeguarding concerns which may indicate child-on-child abuse. This is most likely to include, but may not be limited to:

- **Bullying, including Cyberbullying:** While physical bullying is less probable in an online setting, different forms of cyberbullying remain a significant concern. This includes harassment and intimidation carried out through digital platforms.
- **Sexual Violence and Harassment:** Physical instances may be rare in an online context, but digital forms of child-on-child abuse involving sexual harassment still pose a medium risk.
- **Sexting or Youth Produced Sexual Imagery:** The sharing of sexual images or messages among peers is a notable risk, given the digital nature of interactions in online schools.
- **Initiation/Hazing Violence and Rituals:** While this might be less common in an online setting, it's important to be aware of any form of initiation or hazing-type behaviours, even if the risk is low.
- **'Upskirting':** Although very unlikely in an online school, awareness and education about this issue are essential. Female students should be encouraged to report any such incidents that occur in their daily lives.
- **Physical Abuse:** Physical abuse, such as hitting or biting, is highly unlikely in an online school. However, awareness about the possibility of physical abuse occurring in the children's home environment is important.

Honour Based Violence:

Honour Based Violence (HBV) refers to crimes or incidents committed to defend the honour of a family or community, often encompassing practices such as Female Genital Mutilation (FGM), Forced Marriage (FM), and breast ironing. These abuses typically involve family or community pressure, making them complex and requiring careful consideration of risk factors. When staff suspect a child may be at risk of HBV, they must promptly inform the Designated Safeguarding Lead (DSL). Understanding the broader context of family or community involvement is crucial.

FGM

Identifying Female Genital Mutilation (FGM) in an online school setting can be challenging due to the nature of the interaction. FGM, which involves the partial or total removal of the external female genitalia, is recognized as abuse and is illegal in the UK. It's vital for all staff members, particularly teachers, to be aware of their responsibilities under the FGM Act of 2003.

Under this legislation, if a teacher learns of an FGM act on a girl under the age of 18 during their professional duties, they are legally required to report it to the police, using the telephone number 101. This mandate is part of a broader effort to protect girls and women from this practice. According to the findings, approximately 103,000 women aged 15-49 were estimated to be at risk from FGM in England and Wales, with a further

24,000 women aged over 50. Nearly 10,000 girls aged 0-14 were also identified in England and Wales as being at risk of FGM at some point in their life.

Forced Marriages

The legal age for marriage in England has been raised from 16 to 18 years old, a significant change aimed at better protecting vulnerable children from the detrimental effects of forced marriage. This legislative adjustment is crucial in safeguarding minors in England and Wales.

Forced marriage (FM) is a criminal offence in these regions. It is defined as a marriage entered into without the full and free consent of one or both parties, often involving violence, threats, or other forms of coercion. The Forced Marriage Unit (FMU) offers detailed guidance on this matter, and there are specific multi-agency guidelines focusing on the role of educational institutions in addressing forced marriages.

Comprehensive training has been provided to all full-time staff to effectively identify and respond to potential cases of forced marriage. Figures from the FMU, in 2018, the four countries with the largest number of cases where the forced marriage was due to take place, or where the spouse was currently residing (or both) were Pakistan (687 cases, 46%), Bangladesh (133 cases, 9%), India (85 cases, 6%) and Afghanistan (41 cases, 3%).

Breast ironing

Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother, who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education, rather than be forced into early marriage.

This will be harder to see in our online school, as normally teachers can only see their faces. Teachers will need to be a bit more aware of female students if they come from countries where Breast ironing is practised and more prominent: Cameroon, Benin, Ivory Coast, Chad, Guinea-Bissau, Kenya, Togo, Zimbabwe and Guinea-Conakry, especially if they are missing from school and you know they are travelling to these regions

Prevent Duty

The Prevent Duty, as outlined under Section 26 of the Counter-Terrorism and Security Act 2015, is a key part of safeguarding children from extremist ideologies and radicalization. Similar to protection from other forms of harm and abuse, this duty falls within the broader scope of safeguarding approaches. It aims to prevent young people from being drawn into terrorism.

To support this duty all staff complete Prevent training, equipping them to identify and respond to signs of radicalization.

See Annex A of KCSIE 2023 for further details.

Behavioural signs of abuse and neglect

If a child is being abused, their behaviour may change in a number of ways. For example, they may:

- Behave aggressively or be disruptive, act out, demand attention and require more sanctions than other children;
- Become angry or disinterested and/or show little creativity;
- Seem frightened of certain adults;
- Become sad, withdrawn or depressed;
- Have trouble sleeping;
- Become sexually active at a young age;
- Exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;

- Refuse to change for gym or participate in physical activities;
- Develop eating disorders;
- Self-harm;
- Refuse to attend school or run away from home
- Lack confidence or have low self-esteem; or Use drugs or alcohol.
- At a most basic level teachers need to inform the DSL or the Deputy DSL by email, if they notice pattern of signs that include:
 - Poor attendance
 - Change in behaviour
 - Health or emotional health concerns
 - Bullying

Student Attendance

At Eton Academy, we give paramount importance to student attendance, recognizing that regular participation in educational activities is crucial for a comprehensive learning experience. We are acutely aware that any deviation from regular attendance could signal potential abuse or neglect.

To ensure student safety and wellbeing we closely observe attendance patterns. If a student stops attending without a clear reason such as exclusion, or if absences occur without medical justification, these instances are flagged for further review. Our staff members are thoroughly trained to recognize warning signs related to attendance. This aids in timely and accurate identification of any issues that might be impacting a student's regular attendance. All concerns regarding attendance are meticulously recorded by the DSL and the Deputy DSL in our Safeguarding Concerns log. These issues are also brought to the attention of all teaching staff in subsequent staff meetings for broader awareness and collective vigilance.

Through these measures, Eton Academy ensures a proactive approach towards safeguarding our students, with particular attention to the critical link between attendance and overall student welfare.

Children with Special Educational Needs and/or Disabilities (SEND)

Children with Special Educational Needs and/or Disabilities (SEND) often face increased vulnerability to various forms of abuse, including child-on-child abuse. Recognizing abuse in these children can be particularly challenging due to several factors:

- Misinterpretation of Signs: There's a risk of misattributing signs of abuse (such as changes in behaviour, mood, or physical injuries) solely to the child's disability, without considering the possibility of abuse. This can lead to a failure in recognizing abuse when it occurs.
- Subtlety of Signs: Children with SEND might not exhibit outward signs of distress or harm, such as those seen in bullying. This subtlety can make it difficult to detect when they are being harmed or mistreated.
- Communication Barriers: Children with SEND may have unique communication challenges. These barriers can make it difficult for them to report abuse or for others to understand their experiences. Overcoming these communication challenges is essential for effective safeguarding.

It's crucial for educators and caregivers to approach safeguarding for children with SEND with heightened awareness and sensitivity. This includes actively seeking to understand the unique needs and behaviours of these children and not dismissing potential signs of abuse as merely symptoms or manifestations of their disabilities.

Signs of abuse or neglect manifested by the parents or other responsible adult

Signs of potential abuse or neglect by parents or other responsible adults can manifest in various ways. These signs may not always be direct or obvious, but can indicate underlying issues in the child's environment:

- Unrealistic Expectations: The adult may place demands on the child that are beyond their capability,

whether academically or physically. This can lead to undue stress and feelings of inadequacy in the child.

- Inconsistent or Unconvincing Explanations for Injuries: Adults might offer explanations for a child's injuries that don't add up or seem implausible, suggesting a possible attempt to conceal abusive behaviour.
- Indifference or Rejection: The adult appears uncaring, indifferent, or even overtly rejects the child, which can be emotionally damaging.
- Denial or Blame: The adult denies the existence of or blames the child for problems they are experiencing at home or school, which can indicate an abusive dynamic.
- Negative Perception of the Child: The child is consistently seen or described in a wholly negative light, as worthless or burdensome, which can severely impact the child's self-esteem and mental health.
- Refusal of Help: The adult refuses offers of help for the child's problems, suggesting a reluctance to change the situation or acknowledge issues.
- Isolation: The adult may be physically or emotionally isolated, which can create a harmful environment for the child.

Grooming

Grooming is a process where an individual manipulates a child, significant adults around them, and the environment to facilitate the abuse of the child. This can happen both online and in the real world, and the groomer may be a stranger or someone the child knows. Groomers can be of any gender identity, age, and may not necessarily fit a specific profile, making them harder to identify.

Children and young people who are being groomed may not recognize what's happening as abusive. The signs of grooming can be subtle and are not always immediately apparent. Common indicators include:

- Secrecy, particularly about online activities.
- Relationships with significantly older boyfriends or girlfriends.
- Meeting friends in unusual places.
- Unexplained possessions, like new clothes or mobile phones.
- Access to drugs and alcohol.
- Disappearance from home or school.
- Noticeable behavioural changes.
- Sexual health issues.
- Signs of depression, self-harm, or suicidal tendencies.
- In adolescents, grooming signs can be confused with typical teenage behaviour. However, it's important to be alert to unexplained changes in behaviour or personality and age-inappropriate sexual behaviour.

For a more comprehensive understanding of grooming and its signs, the NSPCC website offers detailed information and resources. This can be particularly useful for parents, educators, and others who work with children, providing them with the knowledge to identify and respond to potential grooming. Visit the NSPCC website for further information about grooming and how to protect children from it.

Signs of grooming and/or online abuse

A child may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet

Indicators of Potential Radicalization Grooming

While there's no definitive checklist to confirm if a young person is being groomed for radicalization, certain indicators can suggest increased risk. These signs, especially when observed together, may point towards vulnerability to such grooming:

- Academic Underperformance: Struggling with or a noticeable decline in school performance.
- Possession of Extremist Materials: Having books, pamphlets, or digital content related to extremist ideologies.
- Economic Hardship: Experiencing poverty, which can make radical ideologies more appealing as a form of empowerment or escape.
- Social Marginalisation: Feeling excluded from mainstream social groups or society at large.
- Exposure to Trauma: Experiencing traumatic events, which can create emotional vulnerabilities that extremists might exploit.
- Influence of Global or National Events: Being impacted by large-scale events or crises, which can be used as a catalyst for radical views.
- Religious Conversion: Newly adopting or fervently practising a religion, especially if it involves extreme or fundamentalist views.
- Behavioural Changes: Showing significant changes in behaviour, attitudes, or appearance that align with extremist ideologies.
- Exposure to Extremist Influence: Being in contact with individuals or groups known for extremist views.
- Family Conflicts: Experiencing clashes with family over lifestyle choices, which can be exploited by radical groups to widen the divide.
- Identity Confusion: Struggling with one's sense of self or place in society, making the person more susceptible to radical ideologies offering a sense of belonging.
- Experience of Hate Crimes: Being a victim or a witness to race or hate crimes can create vulnerabilities that extremists might target.
- Rejection by Peers or Society: Feeling rejected by friends, family, or social groups, which can lead to a search for acceptance in alternative, potentially radical, groups.

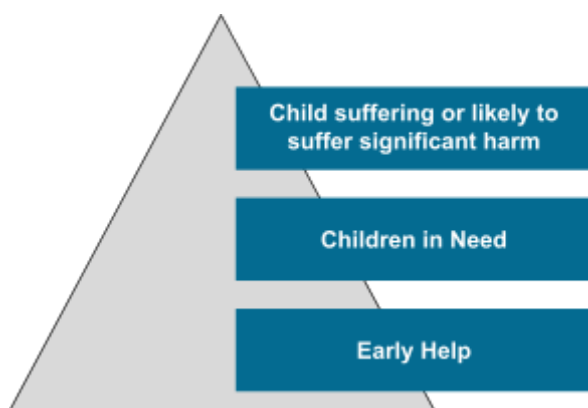
Child Criminal Exploitation

This is more difficult to spot in an online school. A geographically widespread form of harm that is a typical feature of county lines criminal activity is the criminal exploitation of children and young people. This is usually through engaging them into gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market and seaside towns. All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime.

These can include increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing; or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

More information can be found in KCSIE (2023), in the Home Office's 'Preventing youth violence and gang Involvement' and its 'Criminal exploitation of children and susceptible adults: county lines Guidance'. 46,000. Children as young as six are being forced to carry and sell drugs far away from their homes. They are made to skip school, sleep in drug dens, keep secrets from their loved ones. They are treated as criminals when they often feel trapped in a hopeless situation. 46,000 children in England are thought to be involved in gangs. There are likely many more.

5. Stages of Child Protection



The diagram above shows the hierarchy of approaches.

The school can use a range of arrangements depending on the information available. We will always work cooperatively with external agencies, including the local authority and policy.

Early Help

Eton Academy prioritises early intervention when it is deemed suitable. In such cases, the DSL or Deputy DSL will typically oversee coordination with external agencies and arrange for a multi-agency assessment when necessary. Staff members may be asked to assist in these early help assessments and, occasionally, may act as the lead professional. Continuous monitoring of these situations is essential, and should there be no improvement or a decline in the child's circumstances, a referral to Children's Social Care for statutory services evaluation may be considered.

Eton Academy staff should be especially vigilant for early intervention needs in children who:

- Have disabilities and additional specific needs.
- Possess special educational needs, regardless of whether they have a statutory education, health, and care plan.
- Are young carers.
- Show tendencies towards antisocial or criminal behaviour, including gang involvement or connection with organised crime groups.
- Are often absent or missing from care or home.
- Engage in drug or alcohol misuse.
- Are at risk of modern slavery, trafficking, or exploitation.
- Live in challenging family environments, such as those with substance abuse, adult mental health issues, or domestic violence.
- Have returned to their family after being in care.
- Display signs of early abuse and/or neglect.
- Are vulnerable to radicalization or exploitation.
- Are in private foster care.
- Identify as LGBT+ or are beginning to explore their LGBT+ identity.

Children in Need

Under the Children Act 1989, a 'Child in Need' is identified as one who may not reach or maintain a satisfactory

level of health or development, or whose health and development may deteriorate significantly without external services. This also includes children with disabilities. It is mandatory for local authorities to offer services to these children, aiming to safeguard and enhance their welfare. A child recognized as being in need will have undergone an assessment by Children's Social Care as per section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm

Local authorities are obliged to conduct enquiries under section 47 of the Children Act 1989 when there is a reasonable suspicion that a child is suffering, or is at risk of suffering, significant harm. This duty is supported by other relevant organisations as needed. These enquiries are crucial to determine the necessary actions to protect and promote the welfare of the child. They are particularly important in cases of suspected maltreatment, which includes all forms of abuse and neglect, female genital mutilation, so-called honour-based violence, and threats from outside the family such as radicalization and sexual exploitation. In events where an investigation is initiated, the school's role and subsequent actions will be guided by the recommendations of the investigating agency.

6. What to do if you have a concern about a child

This should be read alongside KCSIE 2023 (statutory guidance) – Part One and Annex A.

Safeguarding and promoting the welfare of children is everyone's responsibility (KCSIE 2023). All staff should know what to do when a child discloses abuse to them, they have concerns about a child's welfare, or when children or staff raise concerns about a pupil to them. If a child tells a member of staff that they know about or have been a victim of abuse or neglect the member of staff should:

- Listen carefully and allow the child to speak freely and remain calm. Do not interrupt the child or be afraid of silences.
- Provide reassuring nods and words such as, "I am so sorry this has happened", "You are doing the right thing in talking to me". Avoid saying things like, "I wish you had told me about this earlier" or "I cannot believe what I am hearing". Questioning of the child about what they are saying should not be extensive, as partner agencies will lead any investigation. However, a context around what the child has said should always be sought prior to any referral being made to partner agencies. This should be done by the DSL or DDSL, depending on who obtained the initial disclosure i.e. if a member of teaching staff receives a disclosure or has a concern, the DSL should then also speak to the child, either to corroborate the child's account or to gain further context. Limit questioning to the minimum necessary for clarification using What, When, How and Where, but avoid leading questions such as, "Has this happened to your siblings?" Do not use questions beginning with Why as this can apportion feelings of guilt within a child.
- If the child discloses abuse, it is appropriate to ask whether any other adults were present and observed the abuse and whether the abuse has happened before.
- At an appropriate time, tell the child that the matter will be referred to in confidence, always using language that is appropriate to the age and stage of development of the child, allowing for their individual need.
- Tell the child what will happen next. The child may want to accompany you to see the DSL, otherwise let the child know that someone will come to see them before the end of the day.

If there is a evidence of abuse, suspicion of abuse, or disclosure (direct or indirect), we will respond to it by:

- Referral to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff.
- There should be interviews with the children involved (if appropriate, seek advice).
- Parents of each child should be informed at an early stage and involved in the process unless there is

good reason to believe that involving parents would put the child at greater risk of harm and jeopardise any police/social care investigation; and

- At any point in the process, if there is a concern that a child has been harmed or is at risk of harm, a referral should be made to Social Services and/or the Police immediately.
- Having clear and robust safeguarding procedures in place for responding to abuse (including Child on Child abuse in the Child on Child Abuse Policy.)
- Providing support and training for all staff on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation.
- Making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole, into account.
- Reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.

Documentation and Reporting Procedure

Staff members are required to promptly document any conversations with a child that raise concerns. This should be done digitally using a ['Cause for Concern Form'](#). It is crucial to record the child's exact words, especially when referring to body parts, and these should be enclosed in quotation marks.

Immediate Reporting

Any concerns must be reported without delay to the Safeguarding Lead or the Deputy Safeguarding Lead. Allegations of child abuse are of the utmost urgency and must be referred immediately to the aforementioned authorities.

Collection of Digital Evidence

The Safeguarding Lead or Deputy, will gather relevant digital files from the Classe365. This includes documents, emails, chat transcripts, lesson recordings, email records, and digital notebooks.

Parental Notification

Parents will be informed of any incidents involving their child. In cases of child abuse allegations, parents will be notified within 24 hours.

Precautionary Measures

Staff must remain aware that innocent actions can be misconstrued. Therefore, steps should be taken to prevent misunderstandings and protect against false allegations. For the safety of both staff and students, all lessons are recorded and stored electronically. These recordings are available for use in any subsequent investigations.

Referral Process to Statutory Agencies in Cases of Child Risk

In situations where a child is believed to be at risk of harm, or likely to be at risk (as previously outlined), an immediate referral must be made to Children's Social Care or the police, especially if a criminal act is suspected. The Designated Safeguarding Lead (DSL) typically oversees this process, but any staff member has the authority and responsibility to make such referrals without delay.

The school does not require parental consent to make referrals to statutory agencies.

Seeking parental consent is not advised if it could endanger the child's safety or compromise any investigation by partner agencies, as per the guidance in 'Working Together to Safeguard Children' (WTSC) 2018.

Whilst the above procedures are clear in the UK. They are certainly unclear in areas of the world where there is less of a culture of safe-guarding. We have taken advice from the [International Child Safeguarding Standards](#)

Reporting abuse of children in their community

Abuse arising within the community may not be due to your organisation's programmes or operations. However, your organisation still has a responsibility to report on suspected or actual child abuse taking place. This should be reported to the formal authorities or, where they are weak or corrupt, to organisations that are able to deal with cases appropriately. The reporting process will need to be decided at a local level and advice and guidance must be sought to ensure that children and their families are not put at further risk or made susceptible by the very action of reporting harm and/or abuse.

Eton Academy uses the Child Helpline International database if we need to reach out to international agencies if we have major safeguarding concerns involving our international students. As a global network Child Helpline International shares research/data, knowledge and experiences to enhance the quality of response to children and young people in need of protection, support and guidance and to advocate for their rights.

<https://childhelplineinternational.org/helplines/>

Our research has indicated we can get help from: (Currently, we have students from)

UAE (Dubai and Abu Dhabi)

You can report child abuse to MoI through the hotline number 116111 or through the MoI's Child Protection Centre's website and the 'Hemayati' (Arabic for protect me) app (available on Android and iOS).

Other channels:

<https://u.ae/en/information-and-services/justice-safety-and-the-law/children-safety/report-child-abuse>

Involvement of outside agencies: UAE

Dubai Foundation for Women and Children (DFWAC). This is the first licensed non-profit shelter in the UAE for women and children who are victims of domestic violence, child abuse and human trafficking. It was established in July 2007 by His Highness Sheikh Mohammed bin Rashid Al Maktoum, Vice President and Prime Minister of the UAE and Ruler of Dubai, to offer victims immediate protection and support services in accordance with international human rights obligations. The Foundation provides a helpline, emergency shelter, and support services to women and children victims. DFWAC aims to protect physically, sexually and emotionally abused women and children, prevent ongoing abuse and the escalation of violence and promote social awareness through education and outreach.

DFWAC provides:

- A safe shelter
- Case management
- Medical care
- Psychological support
- Legal, consular and immigration assistance
- Helpline 800 111 or email help@dfwac.ae
- Website – www.dfwac.ae

Dubai Police Human Rights Department 24/7 Duty Officer 056 6862121 Latifa Hospital Child Welfare Unit

Tel: 04 2193000

Fax: 04 3241717

PO Box 4115 Dubai, UAE Working Hours: 24 Hours

Community Development Authority (Centre)

Any child in Dubai who needs help, protection from abuse, or advice can pick up the phone and dial 800-988 any time. Four social workers and psychologists at the Child Protection Centre in Al Barsha are on standby to assist residents under 18 years of age to ensure their rights are protected and upheld. The recently opened centre under the Community Development Authority (CDA) is part of CDA's comprehensive strategy to make Dubai the most secure and ideal environment for children to live. It is tasked with rehabilitating, providing counselling, visiting and assisting children in need. Al Ameen Reporting (Dubai & Federal Police) The Al Ameen Service officially launched in September 2003. Using this service, the people of Dubai can communicate confidentially with the authorities to keep abreast of developments in Dubai, and on issues that concern them. www.alameen.ae/en

Europe/ including France

The Council of Europe Strategy for the Rights of the Child (2016-2021) calls on States to uphold the human rights of children by protecting them from all forms of violence and discrimination, respecting their right to education and encouraging child participation <https://rm.coe.int/090000168098c6cf>

Saudi Arabia

Protecting children from violence: <https://www.my.gov.sa/wps/portal/snp/careaboutyou/childrights>
Child Support Line 116111 provides service in: Arabic and English
Opening hours are: Monday through Sunday from 7am – 11pm

Uganda

Sauti 116
Sauti 116 is sustainable Uganda Child Helpline service embedded into society and consistently offering timely and quality services that respond to child protection need
<https://sauti.mglsd.go.ug/sauti/>
Email: sautichl@mglsd.go.ug or sautichl@gmail.com
Facebook: [sauti 116 Uganda Child Helpline](https://www.facebook.com/sauti116)
Twitter: [@sauti116](https://twitter.com/sauti116)
SafePal App (available in Google play store)
Call 116
Toll free numbers: 0800111222 and 0800111333

Egypt

Child Helpline 16000 provides service in: Arabic
Opening hours are: Monday through Sunday 24/7

Ethiopia

<https://ecfaethiopia.org/>
919
+251221-117575

Qatar

Hotline 919 provides service in: Arabic and English
Opening hours are: Monday through Sunday 24/7
<https://www.aman.org.qa/Ar/Pages/Home.aspx>

Bahrain

Child Helpline 998 provides service in: Arabic

https://www.mlsd.gov.bh/en/childhood/childhood_care/998

Cyprus

Call 116111 Cyprus provides service in: Greek

Opening hours are: Monday through Friday from 12:00-20:00 Saturday from 09:30-14:00

<https://uncrcpc.org.cy/>

Turkey

Türkiye: Gençlik Destek Hattı

Tel: 0850 455 0070 (Turkish)

7. Whistleblowing Policy

Eton Academy maintains a comprehensive Whistleblowing Policy, accessible on our website. This policy underscores the responsibility of all staff members to report any concerns regarding unsafe practices or shortcomings in the care and protection of students. If a staff member suspects that current practices are not up to standard or could potentially endanger a student, they should take the following steps:

Reporting Concerns:

Any concerns should be reported to the CEO.

Nature of Concerns:

It's important to note that concerns raised under this Whistleblowing Policy are separate from issues regarding an adult's suitability to work with or access children.

Protection for Whistleblowers:

Staff members who report concerns in good faith and adhere to the whistleblowing procedures will not face any negative repercussions or sanctions for voicing genuine concerns about unsafe practices.

External Reporting Options:

If a staff member feels unable to raise a safeguarding concern internally at Eton Academy, or if they believe their concern is not being addressed adequately, they have the option to report externally. This can be done through the following channels:

Government guidelines, as outlined on relevant government websites.

The NSPCC whistleblowing helpline is available for those who prefer not to raise child protection concerns within the organisation. Contact can be made by calling 0800 028 0285 (available 8:00am to 8:00pm, Monday to Friday) or by emailing help@nspcc.org.uk.

8. Roles of the Designated Safeguarding Lead and Deputy Safeguarding Leads

The Designated Safeguarding Lead (DSL)

There are 4 key elements to the DSL role. They will:

- Manage referrals
- Work with others
- Train
- Raise awareness

The Designated Safeguarding Lead (DSL) is a senior staff member tasked with spearheading safeguarding efforts in the school, including online safety. This role, which must be held by a member of the school leadership team, carries the primary responsibility for safeguarding and child protection within the school, as explicitly stated in the job description.

Deputy DSLs - Wellbeing and Digital Safety

Eton Academy may appoint multiple Deputy Designated Safeguarding Leads (DDSLs) to assist the DSL in safeguarding duties. While specific tasks of the DSL can be delegated to the DDSLs, the overarching leadership and responsibility for child protection remain solely with the DSL and cannot be delegated. Deputy DSLs receive the same level of training as the DSL, and their safeguarding responsibilities are clearly defined in their job descriptions.

Inter-agency working

Both the DSL and DDSLs engage with local authorities and collaborate with other agencies, prioritising the best interests of the students. Relevant guidelines and frameworks include Safeguarding Partners and Keeping Children Safe in Education (KCSIE) 2023.

Support for the DSL

The DSL is provided with adequate time, funding, training, resources, and support. This empowers them to offer guidance to other staff on child welfare and protection, participate in or facilitate participation in Strategy Discussions and inter-agency meetings, and contribute to child assessments.

There are 4 key elements to the DSL role. They will:

Manage referrals

The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required (in collaboration with HR team); and
- refer cases where a crime may have been committed to the police as required

Work with others

The DSL is expected to:

- liaise with the CEO to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the CEO (in relation to allegations against adults) and the Designated Officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, IT technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- Establish and maintain a section on the schools Homeroom and Staff Intranet (Classe365) where resources and information is stored for access by all pupils and students, and act as a source of support, advice and expertise for all staff.

Training

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required

to carry out their role, including inter-agency working. This training must be updated at least every two years. The DSL should undertake additional Prevent awareness training to the government Prevent training that all school staff undertake.

In addition to the formal training set out above, the DSLs knowledge and skills should be refreshed via informal updates (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise awareness The DSL should:

- ensure the school's safeguarding and child protection policies are known, understood and used appropriately;
- ensure the school's Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietor regarding this;
- ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals to children's social care or the police about suspected abuse or neglect may be made and the role of the school in this; and
- link with the local Safeguarding Partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Safeguarding File Management

Regarding the management of Safeguarding Files at Eton Academy, the following protocols are observed.

When a student leaves Eton Academy, the DSL is responsible for ensuring that a copy of the student's

Safeguarding File is promptly transferred to the new educational institution.

This file should be sent separately from the main student file and must be transmitted securely. Additionally, the DSL should obtain confirmation of receipt from the receiving school or college.

The receiving school must ensure that key personnel, such as their own DSL and Special Educational Needs Coordinator (SENCO), are informed as necessary about the incoming student's safeguarding background.

In addition to the transfer of the Safeguarding File, the DSL at Eton Academy should consider if sharing certain information with the new school ahead of the student's transfer is appropriate.

Availability of Safeguarding Leads

At Eton Academy, we ensure the continuous availability of our safeguarding team during school hours in term time to address any safeguarding concerns. Given the nature of our online school environment:

- The DSL or a deputy is always accessible during school hours, although not in person due to the lack of a physical campus.
- Staff can reach out to the DSL or a deputy through phone, zoom, or other similar digital communication platforms.
- It is the responsibility of the DSL to organise suitable and adequate coverage for any activities that occur outside of regular school hours or during school holidays.

Online Safety

At Eton Academy, we acknowledge the potential risks associated with technology use, but we also firmly believe in the positive role technology plays in facilitating effective and safe online learning. Our approach to online safety encompasses several key aspects:

Leadership and Awareness:

The DSL and the Department managers are tasked with overseeing online safety within the school. They are responsible for raising awareness among staff about various online risks, including child sexual exploitation, radicalization, and sexual predation.

Protection and Education:

Eton Academy is committed to both protecting and educating our school community in the responsible use of technology. We have established mechanisms to identify, intervene, and, where necessary, escalate any incidents relating to online safety. This is reflected in our curriculum, teaching methods, and focus on Digital Safety.

Areas of Online Risk:

Content Risk: Exposure to illegal, inappropriate, or harmful material.

Contact Risk: Harmful online interactions with other users.

Conduct Risk: Personal online behaviour that could lead to harm. This includes creating, sending, or receiving explicit images or engaging in online bullying.

Responsibilities of the Digital Safeguarding Officer

At Eton Academy, the Digital Safeguarding Officer plays a crucial role as a member of the Designated Safeguarding Team. The officer's primary responsibility is to guide the entire school community, providing expertise on policies and best practices for online child safety.

A key aspect of their role includes delivering regular updates on online safeguarding. These updates are presented during professional development sessions for teachers and through workshops aimed at educating students and parents. This proactive approach ensures that all stakeholders are equipped with the latest

information and strategies to promote a safe online environment for children.

For additional information, please refer to the newly updated Online Safety Policy and the Keeping Children Safe in Education (KCSIE) 2023 guidelines.

9. Responsibilities of Eton Academy

It is the responsibility of Eton Academy to:

Ensure that all staff read at least Part One of KCSIE 2023;

Ensure that staff working with children will also read KCSIE Annex A 2023;

Ensure that all staff follow the requirements of this Safeguarding and Child Protection

Policy and Procedures for Safeguarding at Eton Academy:

- Implement strategies to help staff understand and fulfil their responsibilities as outlined in Part One of KCSIE 2023.
- Appoint a senior member of the school, such as to oversee safeguarding procedures. This is Dr Gabrielle Hargreaves and Danielle Viney-Burton as the deputy.
- Align safeguarding practices with the local authority's inter-agency procedures established by the Safeguarding Partners.
- Develop and maintain policies and procedures that enable prompt and effective actions to safeguard and promote the welfare of children.
- Work in accordance with local inter-agency procedures.
- Update the Safeguarding Policy annually and ensure its availability on the school's website.
- Provide a Staff Code of Conduct and an Acceptable Use Policy.
- Adhere to guidelines regarding Children absent from Education, including the Children Missing Education Statutory Guidance (Sep 2016) and recent updates on school attendance and prolonged or repeated absences, as per the Keeping Children Safe in Education (Sept 2023) guidelines.
- Maintain multiple contact numbers for each student, when feasible.
- Report the removal of a child from the school roll to the local authority in compliance with statutory and local guidelines.
- Require all staff to undergo training in safeguarding and child protection, including online safety, as part of their induction, in line with advice from Safeguarding Partners.
- Acknowledge the expertise developed by staff through regular safeguarding training and experience in handling concerns.
- Implement effective online filters and monitoring systems to ensure children's safety on the internet.
- Educate children about safeguarding, encompassing online safety.
- Conduct an annual review of safeguarding arrangements, with a written report.
- Ensure that members of the involved in governance and oversight roles undertake DSL level training, induction, and training.

10. Staff Inductions

Eton Academy has established a comprehensive induction and training program for new staff. This program is crucial for the ongoing professional development and awareness of all staff members. During their induction, staff members are provided with essential resources and training, which they are expected to read and understand:

- Key sections of KCSIE 2023, including Part One and Annex A.
- The Safeguarding and Child Protection Policy and Procedure, including aspects related to whistleblowing.
- The Staff Code of Conduct and the Acceptable Use of IT Policy
- The E-Safety Policy
- The Behaviour and Exclusion Policy.
- The Preventing Extremism and Radicalisation Policy.
- The Child-on-Child Abuse Policy.

Furthermore, new staff members are informed about the DSL and their deputies at the start of their induction.

11. Training

Staff Training

All staff members at Eton Academy are required to participate in comprehensive safeguarding and child protection training annually, typically at the beginning of the academic year.

Throughout the year, the DSL will provide regular updates. These sessions are crucial for equipping staff with the latest knowledge and skills necessary for effective safeguarding. This includes learning about topics detailed in Annex A of KSCIE 2023.

Training for Third-Party Contractors

Third-party contractors who regularly work in the school and have the potential for contact with students should receive basic safeguarding training. This training should be appropriate to their specific roles and responsibilities within the school environment.

Teaching About Safeguarding to Students

Eton Academy is dedicated to actively teaching students about safeguarding issues, including online safety. This forms a part of our broad and balanced curriculum, ensuring that students are well-informed and aware of these critical issues.

Through continuous interaction and guidance, the school aims to build resilience among students. Eton Academy prides itself on being a 'telling school,' where students feel comfortable and encouraged to express any concerns, whether about themselves or others. This culture of open communication and support is integral to our safeguarding ethos.

Safeguarding Education Approach at Eton Academy:

Eton Academy strongly advocates for an environment where students feel comfortable and empowered to express any concerns, including those related to their peers. It's a priority to ensure that every student knows how to voice their concerns, facilitated by guidance from their class teachers.

There is a dedicated safeguarding section on the Homeroom section of the LMS. This section is easily accessible and provides essential information about safeguarding matters, including contacts for staff members who can offer guidance and support.

At Eton Academy, fostering open dialogue between students and their class teachers is a key part of our approach. This enables students to discuss any issues that concern them. Regular discussions about relationship issues are integrated into weekly Personal, Social, Health, and Economic (PSHE) education lessons and during form time.

For our youngest learners, weekly PSHE lessons cover topics such as self-emotions, empathy, friendships, and family relationships. These lessons emphasize the importance of feeling safe and comfortable in all situations. Young students are taught to recognize and express discomfort, understand the concept of personal boundaries, and communicate with a trusted adult about any concerns.

12. Online Safety at Eton Academy

The Digital Safeguarding Officer is a critical member of the Safeguarding Team at Eton Academy, especially given our status as a fully online educational institution.

We actively collaborate with families to raise awareness about the risks associated with online learning. This includes guiding them on setting up appropriate filters and monitoring systems in their homes to safeguard students during their online activities. Further information on keeping children safe online, including when they are accessing the internet at home, is detailed in Annex D of 'Keeping Children Safe in Education' (September 2021).

Approach to Live Lessons

Contrary to some concerns, Eton Academy aligns with the government's stance that live lessons do not pose additional safeguarding risks; in fact, they offer numerous benefits like enhanced student engagement. To ensure safety during live lessons, we have implemented several measures:

- Teachers use neutral/plain or Eton Academy branded backgrounds for online teaching.
- Zoom, a secure platform, is used for delivering live lessons, and sessions are recorded for safeguarding purposes.
- Appropriate privacy settings are rigorously maintained.
- Staff are trained to manage pupil and student interactions effectively, including the use of microphones, cameras, chat functions, and breakout rooms.
- Clear expectations around behavior and participation are communicated to all staff, pupils/students, parents, and carers, as outlined in our Digital Agreements for each Key Stage.
- Lessons are recorded and made available in Class365 for reference and review.

Further Guidance from the Government:

- Guidance from the [UK Safer Internet Centre](#) on safe remote learning which includes detailed advice on live, online teaching
- the safeguarding guidance from [London grid for learning \(LGfL\)](#) includes platform-specific advice

Where children are learning online at home the DfE has provided advice to support schools to do so safely: [safeguarding-and-remote-education](#).

All staff are aware of the school's policy relating to acceptable use of ICT and expectations relating to:

Creating a Safer Online Learning Environment

- Eton Academy prioritises equipping everyone with the skills, knowledge, and understanding necessary to ensure children's safety online. This includes fostering critical thinking and inspiring safe, responsible use of mobile technologies.
- Special attention is given to combating online behaviours that may make students vulnerable, such as sexting (youth-produced sexual imagery).
- The policy covers the use of mobile and digital technology within our digital learning environment, including immersive learning experiences.
- Guidelines for the use of camera equipment, including smartphones, are clearly outlined.
- The policy details steps to be taken in case of concerns and where to seek help.
- Staff guidelines for social media use are also included to maintain a safe online environment.

Combating Cyberbullying

- Cyberbullying, including sexting and coerced image exchange, is treated with the same severity as other forms of bullying and is managed through our anti-bullying procedures.

Understanding Online Risks

- The school educates students, staff, and parents/carers about the risks associated with online content, conduct, and contact.
- Technology plays a significant role in various safeguarding issues, such as child sexual exploitation, radicalisation, and sexual predation, often providing a platform that facilitates harm.
- An effective approach to online safety involves protecting and educating the entire school community about technology use and establishing mechanisms for identifying, intervening in, and escalating incidents as appropriate.

Categorising Online Risks

Online safety risks are broadly categorised into three areas:

- Content: Exposure to illegal, inappropriate, or harmful material.
- Contact: Harmful online interaction with other users.
- Conduct: Online behaviour that increases the likelihood of, or causes, harm.

Staff Awareness and Training

- All staff members are expected to be aware of the risks technology and the internet pose to children and understand their role in preventing, identifying, and responding to these risks.
- Familiarity with the school's Online Health and Safety and Digital Safety Policy is mandatory for all staff. This policy details the school's approach to online safety.
- The Youth Produced Sexual Imagery Policy is another crucial document staff should be familiar with.
- Staff receive training specific to safeguarding issues likely to be encountered in an online schooling environment, ensuring they are prepared to effectively support and protect students.

Youth Produced Sexual Imagery Policy

Whilst many professionals refer to the issue as 'sexting', there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC research has revealed that when children are asked 'What does sexting mean to you?' They are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.'¹ Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages, rather than images.

This policy only covers the sharing of sexual imagery by children. Possessing, creating, sharing and distributing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks which need careful management. On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'². This is to ensure clarity about the issues this advice addresses.

What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

'Youth produced' includes children sharing images that they, or another child, have created of themselves.

'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.

'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

What types of incidents are covered by this policy?

<p>Yes:</p> <p>A child creates and shares sexual imagery of themselves with a peer (also under the age of 18).</p> <p>A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.</p> <p>A child is in possession of sexual imagery created by another child.</p>	<p>No:</p> <p>The sharing of sexual imagery of children by adults as this constitutes child sexual abuse and schools should always inform the police.</p> <p>Children sharing adult pornography or exchanging sexual texts which do not contain imagery ³.</p> <p>Sexual imagery downloaded from the internet by a child ⁴.</p> <p>Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult ⁵.</p>
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1 For the purposes of this policy, 'child', 'youth' and 'young person' refers to anyone under the age of 18; 'adult' refers to anyone aged 18 or over

2 This is in accordance with the new advice [Sexting in schools and colleges: responding to incident and safeguarding young people](#), which has been published by the UK Council for Child Internet Safety

3 All such incidents should be responded to with reference to the school's Online Safety Policy, and in line with the school's Safeguarding Policy

4 As above

5 As above

Disclosure

Every member of the staff at Eton Academy, including non-teaching staff, is trained and aware of how to recognize and refer incidents involving youth-produced sexual imagery. This critical training is part of our comprehensive staff development program.

Understanding the various ways in which a disclosure about youth-produced sexual imagery can occur is essential. It may come directly from the affected child to a class teacher, the DSL, or any school staff member. Alternatively, disclosures might be made through existing reporting structures, or indirectly via a friend, parent, colleague, or even directly to the police.

Any direct disclosure by a child is treated with utmost seriousness and sensitivity. A child who reveals that they are the subject of sexual imagery is likely to be experiencing embarrassment and concern about potential consequences.

It's important to recognize that a disclosure made within the school environment may often be a last resort for the child. There's a high likelihood that they might have attempted to handle the situation independently before seeking help.

Staff members are trained to approach these disclosures with empathy, ensuring the child feels supported and understood. The primary goal is to create a safe and reassuring environment for the child to express their concerns and receive the appropriate assistance and intervention.

Handling Incidents Involving Youth Produced Sexual Imagery at Eton Academy

Upon learning of an incident involving youth-produced sexual imagery, the staff member must immediately refer the case to the DSL and the Digital Safeguarding Officer. This step is critical for a timely and appropriate response in line with our safeguarding policies.

The DSL is responsible for convening an initial review meeting with relevant school staff. This meeting aims to gather initial facts and determine the next steps in handling the incident effectively and sensitively.

The DSL will adhere to the procedures and guidance outlined in the document ['Sexting in schools and colleges: responding to incidents and safeguarding young people'](#). This ensures a standardised and informed approach to dealing with such incidents.

If appropriate, interviews with the children involved in the incident will be conducted. These interviews are handled delicately, ensuring the emotional and psychological welfare of the children is a primary concern.

Parents or guardians of each child involved are informed at an early stage of the process. Their involvement is crucial, except in cases where there is a justified concern that involving them might increase the risk of harm to the child or compromise a police or social care investigation.

At any point during the process, if there is a concern that a child has been harmed or is at risk of harm, an immediate referral is made to Children's Social Care and/or the police. This step ensures that the situation is managed with the utmost seriousness and with the necessary external support.

Procedure for Handling Breaches of Online Safety/Digital Safety Agreements at Eton Academy

Initial Discovery and Reporting

- In instances where offensive or inappropriate content is found in pupil materials (such as on Jamboard, Google Classrooms, etc.), the discovery must be reported immediately.
- If a parent discovers the content and raises a complaint, they should send a screenshot or link of the offensive material to the Digital Safeguarding Officer. Additionally, the CEO must be notified. The parent should be contacted via telephone as soon as possible to acknowledge that the issue is being addressed as a matter of high priority.
- If a staff member discovers the content, they must send a screenshot or link of the offence to the DSL, Digital Safeguarding Officer, and IT department, who will then inform the CEO.

Investigation and Action

- A thorough search of Google Drive, including email and digital notebooks, is conducted. All offending items are recorded and removed.
- The DSL contacts the parents to discuss the situation, the actions being taken, and to inform them that a follow-up email will be sent.
- IT uses Google tools to identify the email address involved in creating the offensive content, determine the IP address where the content was created, and create a record of the item's creation.
- The CEO and DSL liaise with staff involved in the discovery of the content to investigate any relevant history with the students or families.
- The student's email account is suspended and reset. The details of the new account are communicated to the family.
- An email is sent to the parents outlining the incident and the steps taken to address it, as well as guidance on how to move forward.

13. Private Fostering

Private fostering is defined as an arrangement where a child under the age of 16 (or under 18 if they have a disability) is cared for by someone who is not a close relative, legal guardian, or someone with parental responsibility, for a period of 28 days or more. Close relatives include parents, step-parents, aunts, uncles, and grandparents. This arrangement is distinct from a child being 'looked after' by the Local Authority.

Examples of private fostering include:

- Children living away from their family due to various reasons such as parental illness, work commitments, or family conflict.

- Children whose parents are abroad for work or study.
- Children sent to the UK for education or healthcare by their parents.
- Young people living with their partner's family.
- Children involved in holiday exchanges.

Private foster carers might be family friends or individuals from a guardianship organisation who agree to care for a child they may not previously know. If the care extends to 28 days or more, they are recognized as private foster carers, and the Local Authority needs to be notified.

Why Notify the Local Authority?

The law mandates that the Local Authority be informed of all private fostering situations to ensure the child's safety and well-being. This includes notification by the child's parents, the private foster carers, and any professionals who become aware of the arrangement.

Children's Services must:

- Assess the suitability of private foster arrangements.
- Conduct regular visits to ensure the child's welfare.
- Provide necessary advice, help, and support.
- Responsibilities of Eton Academy Staff

Staff members who suspect a student might be in a private fostering arrangement should report their concerns to the DSL. If Children's Social Care is not already aware of the situation, the DSL is responsible for making a referral.

Timescales for informing the Local Authority	
The child is not yet living with the private foster carers	Within 6 weeks beforehand
The child will move in with the private foster carers within 6 weeks	Immediately
The child is already living with the private foster carers	Immediately

14. Looked After Children

A child who is being 'looked after' by their Local Authority is usually known as a 'Child in Care' or a 'Looked after Child'. They might be living with foster parents or at home with their parents under an Interim Care Order granted to social care, or in residential children's homes, or other residential settings like schools or secure units.

Section 67(1) of the Children Act 1989 amended by the children Act 2004) and the Children (Private Arrangements for Fostering) Regulations 2005

A child who is adopted is not a Looked after Child. Occasionally, children are placed into Local Authority foster care under an Interim Care Order when an adoption breaks down and the adoptive parents relinquish the child. Once a Full Care Order is agreed, the child remains in long term foster care. The adoptive parents may or

may not have continued contact with the child, depending on the situation and the emotional impact on the child.

An Interim Care Order will remain in place until care proceedings are concluded (within 26 weeks in most authorities). At the conclusion of care proceedings in any situation, the child will either stay in long term foster care (under a Full Care Order) until they reach the age of 18 years, return to their parents (usually under a Supervision Order), reside with other family members/friends (usually under a Special Guardianship Order), or in some cases be adopted. In all of the latter situations, it is most usual for parents to have agreed contact arrangements with their child, most commonly three times per year.

A child may also have been placed in care voluntarily by their parents who are struggling to manage their children's behaviour, or meet their child's needs due to their own illnesses or disabilities (under section 20, Children Act 1989). In these cases, rehabilitation will always be the aim, but if this is not possible, the Local Authority will apply for an Interim Care Order and finally a Full Care Order. Usually, these parents will have continued contact with their child.

As a result of their experiences both before and during care, Looked After Children are at greater risk than their peers; they are, for example, four times more likely than their peers to have a mental health difficulty. Providing a secure, caring environment and enabling such children to develop strong, trusting and stable relationships with professionals is critical to their safety and wellbeing.

Eton Academy ensures that staff receive training on Looked After Children, including on the reasons children become looked after, their legal status, the support that staff can provide to keep such children safe and the ways in which they can maximise educational stability for Looked After Children.

The CEO, in collaboration with the DSL, (a) is responsible for ensuring that any looked after children are adequately supported by staff in school; (b) has contact details of the child's social worker; (c) ensures that relevant staff members have sufficient information about the child's looked after legal status and care arrangements; (d) works with the DSL to discuss how staff can best support the progress of Looked After Children in the school and meet the needs in the child's Personal Education Plan; and (e) attends Looked After Children reviews and other meetings they are required to attend.

15. Child-on-Child Abuse Policy at Eton Academy

Overview and Staff Awareness

At Eton Academy, all staff members are expected to be vigilant and knowledgeable about the risks of child-on-child abuse. They play a crucial role in preventing, identifying, and responding to such incidents. It is emphasized that child-on-child abuse is a serious issue and should never be dismissed as normal behavior, mere 'banter', or trivialized as 'just having a laugh'. The threshold for action in such cases is low because abuse, irrespective of the perpetrator's age, is always serious.

Definition of Child-on-Child Abuse

Child-on-child abuse encompasses a range of abusive actions perpetrated by one child against another. This can include, but is not limited to, severe forms of bullying (including cyber-bullying) 7, relationship abuse 8, domestic violence 9, child sexual exploitation 10, youth and serious youth violence 11, 'upskirting', harmful sexual behaviour 12, and gender-based violence¹³.

These forms of abuse often do not occur in isolation and may signal broader safeguarding concerns.

7 Please see the school's Anti-Bullying Policy.

8 <https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>

9 This type of abuse relates to abuse between children aged 16 and 17 who are or have been intimate partners or family members. The abuse includes but is not limited to psychological, physical, sexual, financial and emotional.

10 This is a form of sexual abuse where children are sexually exploited for money, power or status. This abuse can be perpetrated by other children or by adults. It can involve violent, humiliating and degrading sexual assaults. In some cases, children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

11 Serious youth violence is any of the most serious offences where the victim is aged 19 or below including murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. Youth violence also includes assault with injury offences.

12 This is any sexual behaviour by a child or young person which is outside of developmentally "normative" parameters. This can (but does not always) include abusive behaviour such as sexual assaults.

13 This is violence that is directed against one gender as a result of their gender.

Complex Dynamics of Child-on-Child Abuse

The dynamics of child-on-child abuse can be complex. For instance, a child involved in an abusive relationship may themselves be subjected to abuse in another context. This complexity underlines the importance of understanding each situation's unique aspects.

A child who is perpetrating abuse might simultaneously be in a position of vulnerability or victimisation in other areas of their life.

Handling Youth Produced Sexual Imagery

Youth-produced sexual imagery, while it may not always be abusive, is a serious concern and must be addressed in line with the school's specific policies regarding such incidents (see above).

Understanding Gender Dynamics

In the context of child-on-child abuse, it's important to recognize that children of all gender identities can be both perpetrators and victims. However, the nature and manifestation of abuse often vary based on gender. Typically, girls are at a higher risk of sexual assault and exploitation, while boys are more likely to be victims of physical, gang-related violence and serious youth violence. This understanding helps in tailoring preventive measures and responses more effectively.

Determining When Behavior Becomes Abusive

Distinguishing abusive behaviour from non-abusive behaviour, such as low-level bullying or age-appropriate sexual experimentation, can be challenging.

The school's Anti-Bullying Policy addresses non-abusive behaviours like low-level bullying. In contrast, behaviors that qualify as abuse are managed under the guidelines of the Child-on-Child Abuse Policy.

Indicators of Abusive Behaviour

Several factors may indicate that a behaviour is abusive:

- Repetition over time or intent to cause serious harm.
- Elements of coercion or pre-planning in the behaviour.
- An imbalance of power between the involved parties, which could be due to differences in age, size, social status, or wealth.

This list is not exhaustive. Staff members are encouraged to use their professional judgement in assessing situations and are required to discuss any concerns with the DSL.

Staff members are trained to identify signs of child-on-child abuse and are expected to exercise professional judgment. If there's any uncertainty or concern, they should consult with the DSL.

Identifying Victims of Child-on-Child Abuse at Eton Academy

Being vigilant and attentive to changes in children's well-being and behavior is crucial in identifying potential victims of child-on-child abuse. The signs of such abuse often overlap with those associated with other forms of abuse. It's important to recognize that these indicators can vary widely among individuals and that the presence of one or more signs does not conclusively indicate abuse. However, they can be valuable clues that prompt further investigation or support.

Potential Signs to Look For

- Attendance and Engagement Issues: A noticeable decline in school attendance, disengagement from classes, or a drop in academic performance that is uncharacteristic for the child.
- Physical Injuries: Unexplained injuries or a pattern of injuries that could suggest physical altercations or abuse.
- Mental Health and Emotional Well-being: Changes in mental health, such as increased anxiety, depression, mood swings, or visible distress.
- Behavioural Changes: The child becoming withdrawn, overly shy, or conversely, acting out. This can also include physical symptoms like frequent headaches or stomach aches, experiencing panic attacks, nightmares, changes in sleeping patterns, either too little or excessive sleep.
- Substance Use: Any indication of drug and/or alcohol use, which may be a coping mechanism for stress or trauma.
- Changes in Appearance or Behaviour: Noticeable changes in the child's appearance or behaviour, including dressing or acting in ways that are not age-appropriate or typical for the child.

This list is not exhaustive, and staff members are encouraged to use their professional judgement when observing these signs. If a staff member suspects child-on-child abuse, they should not hesitate to report their concerns to the DSL.

Susceptibility to Child-on-Child Abuse at Eton Academy

Understanding Vulnerability

While any child can be affected by child-on-child abuse, research and experience have highlighted that certain groups of children may be more susceptible to either perpetrating or becoming victims of such abuse.

Key Research Findings

- Age Factor: Child-on-child abuse is more prevalent among children aged 10 and older, but it can also affect younger children, particularly in the form of harmful sexual behavior.
- Vulnerable Groups: Children who are especially at risk include those who:
 - Have witnessed or experienced abuse or violence themselves.
 - Have suffered significant losses, such as the death of a close family member or friend.
 - Have experienced considerable disruption in their lives, such as moving homes or schools frequently.
- Children with Special Needs or Identities: Children with Special Educational Needs and Disabilities (SEND) and those who identify as LGBT+ are particularly susceptible to both being abused and engaging in child-on-child abuse.

Prevalence of Child-on-Child Abuse

Child-on-child abuse is a significant issue. Various studies have indicated its prevalence in the UK. For example:

- A significant proportion of teenage girls have experienced sexual coercion.
- A considerable percentage of contact sexual abuse among minors is perpetrated by peers.
- There is evidence of a correlation between exposure to pornography among young boys and the development of negative attitudes towards women.

Reporting Concerns

If a staff member at Eton Academy suspects that a child may be at risk of abuse from another child or is abusing others, they must report their concern to the DSL immediately, following the school's policy.

In cases where a child is in immediate danger or at risk of harm, a referral should be made to Children's Social Care and/or the police without delay.

Responding to Child-on-Child Abuse

Initial Discussion and Action: When a staff member reports a possible child-on-child abuse, the DSL will first talk to them to understand the situation. The immediate priority is to make sure the victim(s) and any other children involved are safe.

Contacting Children's Social Care: If the DSL thinks the behaviour could be abusive, they will quickly get in touch with Children's Social Care, usually within 24 hours of finding out about the incident.

Deciding Next Steps: The DSL will work with Children's Social Care to decide what to do next. This might include:

- Making sure all affected children are safe and well.
- Looking into the situation more deeply.
- Referring the case to other agencies, like the police, mental health services, or teams that specialise in dealing with harmful behaviour among young people.

Any response should be decided in conjunction with Children's Social Care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;

- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of child-on-child abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting;
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the school. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the school;
- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in this Safeguarding Policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's well being closely and ensuring that s/he receives on-going support from all relevant staff members within the school; (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term; and
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

Raising Awareness and Reducing the Risk of Child-on-Child Abuse

Staff at Eton Academy receive thorough training on the nature, prevalence, and impact of child-on-child abuse. This training equips them to prevent, identify, and respond effectively to such incidents. The school actively seeks to prevent all forms of child-on-child abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child-on-child abuse and any cases of bullying (no matter how trivial) promptly and appropriately. Bullying is covered in our PSHE curriculum.

16. Sexual Violence and Sexual Harassment between Children

Child-on-child abuse can include two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with, the school's wider approach to child-on-child abuse (see above).

Sexual Violence includes sexual offences which fall under the Sexual Offences Act 2003.

Sexual Harassment refers to 'unwanted conduct of a sexual nature'. This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including

but not limited to making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group;
- be perpetrated by a child of any age against a child of any age;
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation;
- include behaviours that exist on an often progressive continuum and may overlap; and/or
- be online and offline (physical or verbal).

The advice from the Department for Education on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2017 – Updated 2021) has now been replaced and incorporated into the KCSIE 2023. This provides information about what sexual violence and sexual harassment is, how to minimise the risk of it occurring, and what to do when incidents occur, or are alleged to have occurred. The DfE advice highlights best practice and cross-references other advice, statutory guidance and the legal framework. The school will apply the principles set out in it when considering their approach to sexual violence and sexual harassment between children.

Key Points: The above guidance

- stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up
- highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, and encourages early intervention to avoid potential escalation;
- advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum;
- encourages forums that enable children to talk about issues openly;
- includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;
- advises on how to manage a disclosure, either from the child who has suffered abuse or from other children;
- provides guidance on when to carry out a risk and needs assessment for children affected by sexual violence or sexual harassment;
- provides guidance on initial considerations which schools should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the children, and any power imbalance between them; and
- provides guidance on difficult scenarios which schools might encounter, for example, how to handle an incident between two pupils/students which is alleged to have taken place away from school premises.

For greater detail read KCSIE 2023 Part five: Child-on-child sexual violence and sexual harassment.

17. Signposting to further information

Annex A of KCSIE 2023 contains further guidance on a range of specific safeguarding issues. Annex D is particularly relevant where Online Safety and Safeguarding is concerned.

This section should be read by all staff that work directly with children.

Any person that has a concern about a child within the school must follow the procedures outlined within this document.

If staff have any concerns about a child's welfare, they should act on them immediately. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to Children's Social Care (and if appropriate the police) is made immediately.

Annex A of KCSIE 2023 contains guidance on the following issues:

- Children and the court system
- Children absent from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence
- Preventing radicalisation
- child-on-child abuse (Physical child-on-child abuse is very unlikely to happen in an online school, however, staff need to be vigilant with all types of child-on-child digital abuse)
- Sexual violence and sexual harassment between children in schools and colleges (Physical sexual violence is very unlikely to happen in an online school, however, staff have to need to be vigilant with all types of child-on-child digital abuse that involves sexual harassment)
- Upskirting (Very unlikely that this is an issue in an online school. However, staff and students should be aware of this issue and educated in that this can occur in everyday life. Female students should be encouraged to inform their teacher if this has happened to them.)

18. Low level concerns

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or CEO of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and visitor, unless otherwise stated. The school is conscious of its duty of care to pupils/students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting.

The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves, is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect

adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

Staff Code of Conduct

All staff at Eton Academy are required to conduct themselves responsibly and professionally at all times, especially in their interactions with children and specifically with the pupils/students under their care. It is mandatory for staff to adhere to the guidelines outlined in our 'Staff Code of Conduct, including the Acceptable Use Policy'. Staff must be cautious to avoid any behaviour that could potentially be misinterpreted by others.

Understanding the Position of Trust

Staff members, due to their knowledge, position, and authority, are in positions of trust in relation to the young people they are responsible for. The nature of the relationship between a staff member and a pupil is inherently unequal and cannot be considered a relationship between equals.

There is a risk of exploitation and harm to vulnerable young people, and all staff members have a duty to ensure that the imbalance of power in these relationships is never used for personal benefit or gratification.

Legal and Ethical Boundaries

Staff must be aware that it is legally and ethically wrong for anyone aged 18 or over and in a position of trust to engage in sexual activity or touch a child in a sexual manner, regardless of whether the child consents. This legal and ethical boundary applies even if the staff member does not directly teach the child in question.

Definition of a Low-Level Concern

A low-level concern at Eton Academy refers to any worry or suspicion, no matter how small or seemingly insignificant, that an adult's behaviour may not align with the school's Code of Conduct. This could be a specific action or just a general feeling of discomfort or unease about how an adult behaves, especially in their interactions with children.

The Low-Level Concerns Policy at Eton Academy also encompasses self-reports. This means that if a staff member has concerns about their own behaviour or feelings, particularly in relation to their interactions with children, this is also considered a low-level concern.

For instance, if a staff member plans to engage in work activities outside of their contract with the school, they are required to first seek approval from the CEO. This ensures transparency and maintains the integrity of the staff's professional conduct.

Reporting a Low-Level Concern

If you have a low-level concern or wish to self-report a concern about your own conduct, you should notify the DSL via email as soon as possible, ideally within 24 hours of recognizing the concern, especially if it relates to a specific incident.

Process of Handling the Concern

Upon receiving a low-level concern, the DSL will discuss it with the CEO as quickly as possible, and no later than 24 hours after becoming aware of the concern.

The DSL will first determine whether the concern indeed qualifies as a low-level concern or if it should be reclassified as a more serious allegation, which would require handling under a different procedure. Situations where a low-level concern might be reclassified include:

- Meeting the threshold for an allegation.
- A pattern of low-level concerns that collectively amount to an allegation.
- Other information that, when combined with the low-level concern, leads to an allegation.
- In cases of uncertainty, the DSL will seek advice from the CEO possibly on an anonymous basis.

Investigation and Management

After confirming that the concern is low level, the DSL will discuss it with the individual who raised the concern and investigate further if necessary.

Most low-level concerns are minor and are usually addressed through management guidance, training, etc.

The person to whom the low-level concern relates will be informed about the concern once any potential risk has been assessed and identified.

Record Keeping

A confidential record of all low-level concerns, including self-reports, will be kept in a central file. This record will be retained until the staff member reaches the normal pension age or for 10 years thereafter, whichever is longer, to help identify any patterns.

However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- the concern (or group of concerns) has been reclassified as an allegation as above;
- the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure

19. Handling Allegations of Abuse Against Teachers and Other Staff

This section of the policy outlines the procedure for handling allegations made against adults at Eton Academy. All allegations are dealt with in compliance with the statutory guidance provided in KCSIE (Keeping Children Safe in Education) 2023.

Definition of an Allegation

An allegation in this context refers to any concern or claim that an adult working at the school might pose a risk of harm to children. This could be due to their behaviour or actions, whether in their current role or in general contact with children. The policy covers situations where an adult:

- Has behaved in a manner that has harmed or may harm a child.
- Is suspected of committing a criminal offence against or related to a child.
- Has behaved in a way that suggests they might be a risk to children.

An allegation can arise from a specific incident, a pattern of behaviour by the adult, or from cumulative low-level concerns.

Protocol for Reporting an Allegation

This policy applies to all current staff and volunteers, irrespective of where the alleged abuse occurred. Allegations against former teachers or historical allegations of abuse should be directed to the police.

Eton Academy is committed to providing support to anyone facing an allegation. The school will ensure the employee or volunteer has a named contact, especially if they are suspended.

It is crucial that any allegation against a staff member or volunteer is addressed promptly, fairly, and consistently. The approach must balance the need for child protection with support for the person facing the allegation.

Handling Allegations of Abuse Against Staff

Procedural Approach and Judgment

The procedures for addressing allegations need to be applied judiciously and with common sense. Not all cases will necessitate a police investigation or inquiry by Children's Social Care services. Where this is the case, local procedures will be followed to resolve the situation promptly.

Initial Discussion

Upon an allegation being made, the DSL will first consult with the CEO before initiating any investigation. The DSL and CEO will jointly consult with the police, contacts within the international settings of families and Children's Social Care as appropriate

The initial discussion aims to assess the nature and context of the allegation to determine the right course of action. The CEO may request additional information to inform the decision-making process such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children.

In situations where immediate police involvement is necessary (e.g., an immediate risk to children or evidence of a possible criminal offence), the DSL should engage with the police directly. If there is no immediate evidence, a discussion with the CEO is advised to determine the necessity of police involvement.

The outcome of the initial information sharing and evaluation might lead to a decision that no further action is required. In such cases, this decision, along with the rationale, should be documented by the DSL. They must also decide what information will be communicated to the individual concerned and who will do so. The DSL and CEO will then determine the subsequent steps for both the individual facing the allegation and the individual(s) who made the allegation.

Inter-agency Strategy Discussion

If the child is suspected to be at risk of significant harm, a strategy discussion will be convened by the DSL or the police, following the guidelines in 'Working Together to Safeguard Children'.

The discussion will consider the context of the allegation, including the entitlement of staff to use reasonable force in certain circumstances.

The CEO will not inform the accused person until the relevant agencies have been consulted and agree on the information that can be disclosed. The accused person will be informed after consultation with the DSL.

Next Steps if No External Investigation is Needed

If an external investigation is not required, the CEO will discuss the next steps with the DSL. This may range from no action to dismissal or a decision not to use the person's services in the future.

Suspension should not be automatic; it should only be considered if no reasonable alternative is available.

Procedure for Internal Investigations

When an allegation requires further inquiry to decide the appropriate course of action, the CEO will determine how the investigation should be conducted.

Determining the Investigator

For more straightforward cases, it is typically decided that an internal investigation will suffice. This investigation is usually conducted by a senior member of the school staff.

In situations where the allegation is more complex or due to resource constraints, an independent investigator may be necessary. The appointment of an independent investigator will be made by the CEO.

Coordinating with Other Procedures

If a safeguarding concern or allegation also triggers another internal procedure, like a grievance or disciplinary action, that procedure will only commence after the safeguarding concern or allegation has been thoroughly investigated.

This ensures that the immediate safeguarding concerns are prioritised and resolved before addressing any related procedural matters.

Suspension of an employee

Consideration Before Suspension

Eton Academy exercises careful consideration in deciding whether a case's circumstances warrant suspending an employee from contact with children at the school. The school explores all possible alternatives to suspension until the allegation or concern is resolved.

Risk Assessment and Management

The potential risk of harm to children posed by an accused employee is critically evaluated in relation to the specific children involved in the allegations.

Suspension is not a default response to an allegation. Every effort is made to consider and implement alternatives before resorting to suspension.

In certain rare instances, the risk assessment may lead the Executive Director/Manager to consider suspending the accused employee until the resolution of the case.

Reporting Welfare Concerns

If the Designated Safeguarding Lead (DSL) has concerns about the welfare of other children in the community or the family of the teacher, these concerns must be reported to the Board of Directors, Children's Social Care, or the police, as necessary. However, suspension is generally not justified solely on the basis of these external welfare concerns.

Decision-Making Process for Suspension

Within Eton Academy, the decision to suspend an employee requires the authorization of the CEO. The school's policy involves a discussion with the DSL and Department Heads to arrive at a well-rounded decision on whether suspension is the appropriate course of action.

Criteria for Considering Suspension

Suspension is contemplated only in serious circumstances. These include situations where:

- There is reason to believe that a child or other children at the school are at risk of harm.
- The nature of the allegation is so severe that it might lead to dismissal.
- It is crucial to understand that suspension is not an automatic response. Each case is considered on its merits.

Decision-making Process

The decision to suspend an employee rests with the CEO. They will thoroughly assess whether the circumstances justify suspension from contact with children at the school, or if other measures are sufficient until the allegation is resolved.

Action in Case of an Interim Prohibition Order

If the school becomes aware that the Secretary of State has issued an interim prohibition order against an individual working at the school, immediate steps are taken to comply with the order.

In such cases, pending the outcome of the Teaching Regulation Agency (TRA) investigation, the individual under the interim prohibition order is not allowed to undertake any teaching work.

Evaluating Alternatives to Immediate Suspension

Before deciding on suspension, the CEO will consider if the objectives of suspension can be achieved through alternative arrangements.

Often, investigations can be resolved swiftly without necessitating suspension. If there are no objections from the Board, police, and Children's Social Care services to the staff member continuing their duties during the investigation, the Executive Director will explore creative solutions to avoid suspension.

Considering Risk and Alternatives

Based on a risk assessment, the Board of Directors/Chair will contemplate various alternatives before proceeding with a suspension:

- Redeploying the staff member within the school to avoid direct contact with the concerned child/children.
- Assigning an assistant to monitor interactions with children.
- Reassigning to tasks within the school that don't involve unsupervised access to children.
- Changing the class arrangements for the child/children involved, ensuring they don't come into contact with the staff member, and clarifying with parents that this is not a punitive measure.
- Temporarily moving the staff member to a different role or location, such as another school.

These measures allow for a more informed decision on suspension and can mitigate the immediate impact of the allegation. The nature of the allegation is a significant factor in these decisions.

The CEO will also consider the potential damage to the employee's professional reputation in cases where allegations are later found to be unsubstantiated or malicious.

Procedure for Implementing Suspension

If suspension is deemed necessary, the rationale must be documented by the CEO. This documentation should detail the considered alternatives and the reasons for their rejection.

In cases of suspension, the individual will receive written confirmation within one working day, detailing the reasons for the suspension as much as possible. The school will also provide guidance on where the suspended employee can seek support.

The individual will be informed about their named contact within the organisation along with contact details. The Children's Social Care services or the police cannot mandate the suspension of a staff member or volunteer, but their advice will be taken seriously. The ultimate decision to suspend lies with Eton Academy as the proprietor.

If a strategy discussion or initial evaluation leads to enquiries by Children's Social Care services or a police investigation, the CEO will seek their views on whether the accused staff member should be suspended. This input informs the school's decision-making regarding suspension. Police involvement alone does not necessitate suspension; each case is assessed individually based on a risk assessment.

Support for Employees

Eton Academy is committed to fulfilling its duty of care towards employees, especially those facing allegations. The school actively works to manage and minimise the stress associated with the allegations process. Individuals accused of misconduct will be informed about the concerns or allegations at the earliest opportunity and briefed on the anticipated course of action, unless advised otherwise by Children's Social Care services or the police.

The accused individuals are encouraged to seek support from their trade union representative or a colleague.

The CEO will appoint a named representative to keep the accused individual updated about the progress of their case and to consider additional support mechanisms as appropriate.

Particular attention is given to those who are suspended to ensure they remain informed about their case and any relevant work-related updates.

Social interactions with colleagues and friends are not restricted unless there is evidence that such contact could adversely affect the evidence collection process.

Parents or carers of the involved child or children will be informed about the allegation as soon as possible, except in cases where strategy discussions or involvement of external agencies necessitate a delay.

Parents or carers will be kept informed about the progress and outcome of the case, including any disciplinary procedures. However, the specifics of the disciplinary hearing cannot usually be disclosed.

They will also be advised about the importance of maintaining confidentiality during ongoing investigations, as per section 141F of the Education Act 2002. If they wish to challenge reporting restrictions, they will be advised to seek legal advice.

In situations where a child may have suffered significant harm or where there is a potential criminal prosecution, Children's Social Care services or the police will determine the necessary support for the child or children involved.

Timescales

Eton Academy is committed to handling all allegations with both urgency and thoroughness. The goal is to resolve cases swiftly while ensuring a fair and comprehensive investigation process. The duration of investigations into allegations can vary, influenced by several factors such as the nature, severity, and complexity of the allegation. In instances where it is immediately clear that an allegation is unsubstantiated or malicious, the aim is to resolve these cases within one week. Despite the rapid resolution of such cases, any related safeguarding concerns will be meticulously evaluated. Any concerns about safeguarding will always be discussed with the DSL who will forward concerns to the CEO.

Confidentiality in Handling Allegations at Eton Academy

Maintaining Confidentiality

Eton Academy is committed to upholding confidentiality and preventing unwanted publicity while investigating or considering an allegation. This commitment is in alignment with the provisions of the Education Act 2002.

The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so, or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent who, for example, published details of the allegation on a social networking site, would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted).

The CEO, in consultation with the police, and Children's Social Care services, will determine:

- Who needs to know about the allegation and what specific information can be shared.
- Strategies for managing speculation, leaks, and gossip.
- What information, if any, can be shared with the wider community to minimize speculation.
- How to handle media interest if it arises.

Oversight and Monitoring

The CEO holds overall responsibility for overseeing the procedures related to allegations against staff members. This includes:

- Addressing any inter-agency issues.
- Liaising with Safeguarding Partners regarding these procedures.
- Coordinating with police and other relevant agencies.
- Monitoring the progress of cases to ensure they are handled efficiently, maintaining a balance between speed and a thorough, fair process.
- Regular reviews of ongoing cases are conducted, with the frequency (fortnightly or monthly) determined by the case's complexity.

Designated police officers are tasked with:

- Liaising with the CEO or the Designated Safeguarding Lead (DSL) during the strategy discussion or initial evaluation phase.
- Reviewing the progress of cases involving a police investigation.
- Communicating the outcome of investigations or any resulting prosecutions.

If a police investigation is deemed necessary, the police will establish a target date for reviewing the investigation's progress and consulting with the Crown Prosecution Service (CPS). This review ideally occurs no later than four weeks after the initial assessment. For ongoing investigations, subsequent review dates are typically set at fortnightly intervals during the initial meeting.

Information Sharing

During strategy discussions or initial evaluations, it is crucial for all involved agencies to share pertinent information about the individual at the centre of the allegation, as well as about the alleged victim.

When the police are involved in an investigation Eton Academy will request the police to seek consent from the involved parties to share their statements and evidence for the school's internal disciplinary process. The aim is to facilitate the police in sharing relevant information promptly upon the completion of their investigation or after any court proceedings. Gaining consent early in the police investigation aids in a more seamless and efficient sharing of information.

Similarly, Children's Social Care services are encouraged to follow a parallel procedure when conducting their inquiries. This ensures that any information relevant to a disciplinary case, obtained during the investigation to determine the needs of the child or children named in the allegation, is passed to the school without delay. The collaboration between Children's Social Care services and Eton Academy is streamlined to facilitate timely and effective information sharing.

Procedure Following a Criminal Investigation or Prosecution

Following the completion of a criminal investigation or prosecution, the police are responsible for promptly informing the employer and the CEO at Eton Academy. This notification is also required if an investigation is closed without charges, or if a decision is made not to continue prosecution after charges have been filed.

Upon receiving information from the police, the CEO will determine the necessity and nature of any further actions. This may include considering disciplinary measures against the employee involved in the allegations. The decision-making process will be informed by the outcomes and findings provided by the police and/or Children's Social Care services.

When deciding on further action, the following will be taken into consideration the results of the police investigation or trial and the differing standards of proof required in disciplinary proceedings compared to criminal proceedings.

Defining the Outcome of Allegation Investigations

To ensure clarity and fairness in the handling of allegations, Eton Academy uses the following definitions when determining the outcomes of investigations:

- **Substantiated:** This outcome is used when there is sufficient evidence to prove the allegation. The evidence conclusively indicates that the allegation is true.
- **Malicious:** An allegation is deemed malicious if there is enough evidence to disprove it and it is established that there was a deliberate intent to deceive. This implies that the allegation was made with the knowledge that it was false.
- **False:** This outcome is applied when there is sufficient evidence to disprove the allegation, but unlike a malicious allegation, there is no indication that the person making the allegation did so with intent to deceive.
- **Unsubstantiated:** This term is used when there is insufficient evidence to either prove or disprove the allegation. It's important to note that this outcome does not imply either guilt or innocence. It simply indicates that there isn't enough evidence to make a definitive conclusion about the allegation's validity.
- **Unfounded:** This outcome reflects cases where there is no evidence or proper basis to support the allegation being made. Essentially, it indicates that the allegation lacks factual basis or validity.

Conclusion of a Case

Upon the conclusion of a case, if it is found that an individual has engaged in conduct harmful or potentially harmful to a child, Eton Academy is legally required to make a referral to the Disclosure and Barring Service (DBS). If an allegation is substantiated and results in the dismissal of the person, cessation of their services, resignation, or any other form of termination, the case will be referred to the DBS. The DBS will then assess whether the individual should be included on the barred lists, which prevent them from working with children. For cases involving teaching staff, the matter will also be referred to the Teaching Regulation Agency (TRA) to consider if the individual should be prohibited from teaching due to professional misconduct.

When a suspended employee is cleared to return to work, the CEO/Department Manager will plan how to facilitate their reintegration. This process recognizes the potential stress and impact of the situation on the individual.

Supportive measures, such as a phased return to work or the assignment of a mentor, may be considered based on the individual's needs. These initiatives aim to provide assistance and support in the transition back to the workplace.

Additionally, careful consideration will be given to managing the individual's interactions with the child or children who made the allegation, particularly if they are still students at the school. This step is crucial to ensure the well-being of all parties involved.

Handling Malicious or Unsubstantiated Allegations at Eton Academy

Referral to Children's Social Care Services

In cases where an allegation is found to be unsubstantiated or malicious, the CEO will refer the matter to the Children's Social Care services. This is to assess whether the child who made the allegation needs services or may have been abused by someone else.

Addressing Deliberately Invented or Malicious Allegations

If an allegation is proven to be deliberately invented or malicious, the CEO and Leadership Team at Eton Academy will consider appropriate responses. This could include:

- Disciplinary action against the pupil who made the false allegation.
- Consulting with the police to determine if action should be taken against the person responsible for the false allegation, regardless of whether they are a pupil at the school.

Review and Improvement Post-Substantiated Allegations

After resolving a case where an allegation is substantiated, the CEO will conduct a thorough review of the circumstances. The purpose of this review is to identify any potential improvements that can be made to the school's procedures and practices to prevent similar incidents in the future.

This review will specifically consider aspects related to the decision-making process around suspension, including the justification for suspension, its duration, and overall handling.

In cases where an individual is reinstated post-suspension, lessons will be learned regarding the use of suspension. The aim is to assess and understand the impact of suspension and to explore ways in which similar future investigations might be conducted without resorting to suspension. The CEO will reflect on these cases to enhance decision-making processes and ensure more effective and fair handling of such situations in the future.

Handling Resignations and 'Settlement Agreements'

Pursuing Allegations Post-Resignation

At Eton Academy, if an individual facing an allegation resigns or ceases to provide their services, this does not halt the follow-up of the allegation. The school will continue to investigate in accordance with KCSIE (Keeping Children Safe in Education) 2023 guidelines.

A referral to the Disclosure and Barring Service (DBS) is mandatory if the situation meets the criteria outlined in KCSIE 2023. Similarly, a referral to the Teaching Regulation Agency (TRA) will be considered if it aligns with the criteria set in KCSIE 2023.

Settlement Agreements and Legal Obligations

Eton Academy will not use settlement or compromise agreements in cases where the accused resigns or ceases providing services, and the criteria for DBS referral are met.

Entering into such agreements in circumstances requiring a DBS referral is not only inappropriate but could also constitute a criminal offence. This is because it would prevent the school from fulfilling its legal duty to make the referral.

Importance of Concluding Allegations

It is crucial to strive for a conclusion in all cases involving allegations related to the safety or welfare of children, even if the accused refuses to cooperate with the process.

The accused will be given opportunities to respond to the allegation. However, the process of documenting the allegation, gathering evidence, and reaching a judgement will continue irrespective of the accused's level of cooperation.

In cases where the accused's period of notice expires before the conclusion of the process, it may be challenging to impose disciplinary sanctions, but reaching a conclusion is still essential.

Use of Settlement Agreements

Eton Academy does not employ 'settlement agreements' in cases where there is a refusal to cooperate or if the individual resigns before their notice period concludes. These agreements will not impede a thorough police investigation when necessary.

Record Keeping

When an allegation is determined to be malicious, records of such allegations will be removed from the accused individual's personnel files, respecting their right to a fair and unblemished record.

Documentation of Other Allegations

For all other types of allegations (other than malicious ones), comprehensive documentation is essential. This includes:

- A clear summary of the allegation.
- Details of the investigation process.
- Resolution of the case.
- Any actions taken and decisions made.
- This information is kept in the accused individual's confidential personnel file, and a copy is provided to the person concerned.

The record serves multiple purposes:

- It ensures accurate information is available for future reference requests.
- It provides necessary context if future DBS checks reveal police information regarding an allegation that did not lead to a conviction.
- It prevents unnecessary re-investigation if an allegation resurfaces after some time.

Records will be retained at least until the accused reaches the normal pension age or for 10 years from the date of the allegation, whichever is longer, in accordance with the guidance from the Information Commissioner on employment practices.

References

In providing employment references, Eton Academy will not include cases where an allegation was proven to be false, unsubstantiated, or malicious.

Similarly, a history of repeated concerns or allegations that were found to be false, unsubstantiated, or malicious will not be mentioned in any references.

Summary of the main changes to KCSIE 2023

There are no big changes to the KCSIE 2023 guidance, but schools will need to understand and implement these points from 1 September:

- School and college staff will need to realise the difficulties children and young people may have in telling someone they've been abused and recognise how important it is for staff to understand abuse and how to respond to concerns about it. Staff will also need to be able to determine how best to build trusted relationships with children and young people which facilitate communication.
- Extra-familial harms are referenced throughout the guidance. This is harm that occurs to children outside of their family and often occurs during adolescence. The guidance recognises the impact of witnessing ill treatment of others. Intra-familial harm is also highlighted and the need for support for any siblings.
- The previously standalone departmental advice Sexual violence and sexual harassment between children in schools and colleges is incorporated into the guidance.
- References to 'peer-on-peer abuse' have been changed to 'child-on-child abuse' to make it clear who the guidance is referencing.

The language regarding allegations and low-level concerns is more consistent throughout the guidance. Online safety messaging has been strengthened throughout the guidance and has been embedded into Part two of the guidance and annex B/C. The guidance promotes a whole school approach – from having appropriate training that should include governors, to communicating with parents and carers how children can stay safe online and what filtering and monitoring systems the school uses. These systems should be reviewed for their effectiveness.

As of September 2023, there is an increased expectations and responsibilities around the schools filtering and monitoring IT systems. These include:

The DSL and Safeguarding Team should take lead responsibility for the above.

Staff Safeguarding and Child Protection training should include an understanding of the above.

Reiteration that schools should follow the recently published DfE publication of [Filtering and monitoring standards](#) and guidance.

Governing bodies/proprietors strategic training should include an understanding of the above and should review the above standards with IT staff and service providers.

Schools should consider meeting the [Cyber security standards](#).

The Safeguarding and Child Protection Policy, and Online Safeguarding Policy should reflect the individual schools' approach to the above on school devices and networks.

For safer recruitment, schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates, as part of the shortlisting process. Schools should inform shortlisted candidates that online searches may be done as part of due diligence checks. Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file

The importance of PSHE in preventative education.

The importance of the DSL's understanding and implementation of an appropriate adult when required (PACE Code C 2019).