



# **Lumen Academy**

Embrace Educate Empower

## **Child protection and Safeguarding Policy**

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## Document History

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## 1. Definitions

1.1 'Safeguarding' is defined in Keeping **Children Safe in Education (2024)** as;

- **Providing help and support to meet the needs of children as soon as problems emerge.**
- protecting children from maltreatment;
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

1.2 'Child Protection' is the intervention that occurs when children have been significantly harmed or are at risk of significant harm.

1.3 'Child' refers to everyone under the age of 18.

1.4 'Parent' refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers.

1.5 'Staff' or 'members of staff' refers to all teaching, non-teaching, support, supply, peripatetic, contract staff, advisory board, volunteers working in or on behalf of the Lumen Academy Ltd.

1.6 Within this policy, we use the term 'victim', although it is recognised that not everyone considers themselves to be a victim or would want to be described in this way. We also recognise the importance of not using the terminology of 'perpetrator' in relation to children in cases where the behaviour can be harmful to both parties. The appropriate use of terminology will be determined on a case-by-case basis.

## 2. Introduction

2.1 We recognise that safeguarding, child protection, and promoting the welfare of children is an essential part of our duty of care to all students. As such, all staff and advisory board have a responsibility to provide a safe environment in which children can learn. We understand that safeguarding, child protection and promoting the welfare of all children is everyone's responsibility and that everyone has a role to play in protecting children. We recognise that our academy is a part of a wider safeguarding system for children and work closely with other agencies to promote the welfare of children. We maintain an attitude of 'it could happen here' and will consider what is in the best interests of each child in line and upholding the Human Rights Act 1998 and Equality Act 2010.

2.2 The purpose of this policy is to;

- Promote safeguarding and child protection and to demonstrate the Lumen Academy's commitment to keeping children safe;

- Provide all members of staff with the information required to meet their safeguarding duty and protect children from harm;
- Provide stakeholders with clear information relating to the Lumen Academy's safeguarding and child protection procedures;
- Ensure that staff understand, can recognise and can respond to the indicators of abuse, exploitation or neglect;
- Ensure that all staff are aware of their mandatory reporting duty in relation to Section 5B of the Female Genital Mutilation Act 2003; and
- Ensure that children are protected from maltreatment or harm.

### 2.3 Lumen Academy Ltd is committed to the following principles:

- All children have the right to be protected from harm.
- Children should feel safe and secure and cannot learn unless they do so.
- All staff are responsible for keeping children safe and have a responsibility to act if they think a child is at risk of harm.
- All staff take on a responsibility to promote children's welfare
- Providing support to families and/or children as soon as a problem emerges is essential to improving outcomes for children and families.

### 2.4 Safeguarding aims

2.4.1 The safeguarding aims of the Lumen Academy Ltd, in line with Keeping Children Safe in Education (September 2024) are to;

- work to identify children who are suffering or likely to suffer abuse, exploitation or neglect and act to protect them;
- work with relevant services and agencies to ensure that children are protected from harm;
- provide a learning environment for children which is safe and secure;
- teach children how to keep themselves safe and provide structures for them to raise concerns if they are worried or at risk of harm;
- support children's mental health and wellbeing;
- ensure that we adhere to safer recruitment guidance and legislation, deal promptly with allegations of abuse against staff and take bullying and harassment seriously;
- train staff effectively in all safeguarding issues (including online safety) and in their responsibilities for identifying and protecting children that are or may be at risk of harm;
- have a designated safeguarding lead and designated deputy, who will provide support to staff, students and families;
- recognise that all children may be vulnerable to abuse, but be aware that some children have increased vulnerabilities due to special educational needs or disabilities or particular protected characteristics (LGBTQ+, etc);

- maintain a robust recording system for any safeguarding or child protection information;
- ensure that everyone in Lumen Academy understands the safeguarding procedures; and to
- regularly review policies and procedures to ensure that children are protected to the best of our ability.

2.5 This policy adheres to the following documents;

- [Keeping Children Safe in Education \(2024\)](#)
- Working Together to Safeguard Children 2018 (updated 2022)
- Guidance for Safer Working Practice for those working with children and young people in education settings (May 2019)
- Guidance for Safer Working Practice for those working with children and young people in education settings addendum (April 2020)
- What to do if you are worried a child is being abused: Advice for practitioners (2015)

[We continue to work closely with the Local Authority and the Warwickshire Front Door to safeguard children across the city.](#)

2.6 Please note that there are a number of other documents (statutory and non-statutory) that inform our policy and practice. A list of these can be found in Annex B of [Keeping Children Safe in Education \(September 2024\)](#).

2.7 This policy should be read in conjunction with the policies found in Appendix A, some of which have links to the local authority. Paper copies of the policies can be requested if necessary. There is an expectation that all staff have read the following policies and documents, within the first two weeks of the Autumn Term or, for new starters, within the first two weeks of their employment:

[Keeping Children Safe in Education 2024](#)

Staff Code of Conduct

Behaviour Management Policy

Missing Child Policy

Child on Child Abuse Policy

Links to these policies can be found in Appendix A.

2.8 Scope

2.8.1 This policy applies to all teaching, non-teaching, support, supply, peripatetic, contract staff, advisory board and volunteers working in or on behalf of the Lumen Academy Ltd. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

2.9.2 Rather than duplicating content from [Keeping Children Safe in Education \(September 2024\)](#) in this policy, it should be understood that Lumen Academy will always refer to this document as the benchmark for all safeguarding practice.

### 3. Roles and Responsibilities

#### 3.1 The Role of the Directors and the Advisory Board.

3.1.1 Part 2 of Keeping Children Safe in **Education (September 2024)** sets out the responsibilities of governing bodies. As part of these overarching responsibilities the Director will;

- Have a strategic leadership responsibility for the Lumen Academy Ltd safeguarding arrangements
- Ensure Advisory Board receive appropriate safeguarding and child protection training (including online safety) at induction and that is regularly updated.
- Aware of the obligations under the Human Rights Act 1998 , the Equality Act 2010 and the Public Sector Equality Duty
- Ensure that they comply with their duties under legislation.
- Ensure a whole Lumen Academy approach to safeguarding, including the use of mobile and smart technology.
- Ensure that policies, procedure and training are effective and comply with the law at all times and that they allow concerns to be responded to in a timely manner.
- Ensure we consider local authority policies and supply information as requested by the safeguarding partners (the Local Authority, a clinical commissioning group for an area within the local authority and the chief office of police for a police area within the local authority).
- Ensure we have an effective child protection policy, that it is published on the website and review this annually.
- Ensure we have a staff behaviour policy or Code of Conduct which refers to low level concerns, allegations against staff and whistleblowing procedures alongside acceptable use of technologies.
- **Ensure that all staff members undergo safeguarding and child protection training on induction (including online safety and filtering and monitoring process ) and this is regularly updated.**
- Ensure we contribute to multi-agency working in line with statutory guidance. •
- Ensure that there are clear systems and processes in place for identifying when children may be experiencing mental health problems.
- Ensure that children are taught about safeguarding, including online safety as a Lumen Academy approach and curriculum planning but recognising that a one size fits all approach may not be appropriate for all children. See section 12 of this policy for further information.
- Put in place and follow appropriate safeguarding responses for children who go missing from education.

- Appoint an appropriate member of staff from the senior leadership team to the role of Designated Safeguarding Lead.
- Understand the local criteria for action and local protocol for assessment.
- Recognise the importance of information sharing between practitioners and local agencies but take a risk-based approach to level of information that is provided to temporary staff, volunteers, and contractors.
- Ensure that appropriate filters and monitoring systems are in place to keep children safe online and share information regarding online abuse and risks including where to access advice with parents and carers.
- Respond to allegations of abuse against the Principal whilst ensuring there are procedures in place to manage safeguarding concerns or allegations against staff (including supply staff, volunteers, and contractors); and
- Ensure safer working practice is embedded and effective within policies.

### 3.2. The Role of the Principal

#### 3.2.1 The Principal ;

- Ensure that this policy is reviewed annually at minimum
- Ensure that this policy and associated procedures are adhered to by all staff;
- Ensure that all staff are made aware of the named Designated Safeguarding Lead.
- **Ensure that the role of 'Designated Safeguarding Lead' is explicit in the role-holder's job description including leading on filtering and monitoring processes;**
- Decide whether to have one or more deputy safeguarding leads and ensure they are trained to the same standard as the Designated Safeguarding Lead.
- Organise appropriate cover for the role of Designated Safeguarding Lead for any out of hour/out of term activities.
- Appoint a 'Designated Teacher for Looked-After and Previously Looked-After Children' to promote the educational achievement of children looked after.
- Appoint a lead for online safety; (DSL will still retain ultimate responsibility for this).
- Promote a whole Lumen Academy approach to safeguarding.
- Promote resilience to social and emotional wellbeing, which is tailored to the needs of the children.
- Ensure that all recruitment follows the 'Safer Recruitment' guidance, and a single, central record is maintained with details of all members of staff who are in contact with children.



- Respond to low level concerns and allegations of abuse against all other members of staff including supply staff, volunteers, and contractors.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency as required.
- Ensure that the DSL collaborates with Children's Services, the Police, Health services and other services to;
  - promote the welfare of children;
  - provide a co-ordinated offer of Early Help assessments when need is identified;
  - contribute to inter-agency plans for children subject to children protection plans and to protect children from harm.
- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012); and
- Ensure that children's Services (from the host local authority or placing authority) have access to Lumen Academy to conduct, or to consider whether to conduct a section 47 or section 17 assessment, as per Keeping Children Safe in Education (September 2022).

### 3.3 The Role of the Designated Safeguarding Lead

3.3.1 The Designated Safeguarding Lead for Lumen Academy is **Zoe Thomas** and Deputy Designated Safeguarding Lead is **Monika Sethi**. The Designated Safeguarding Lead will;

- Take overall lead responsibility for safeguarding and child protection (including online safety and filtering and monitoring);
- Liaise with the safeguarding partners and work with other agencies in line with Working Together to Safeguard Children (2023).
- Always be available during term time academy hours for staff in Lumen Academy to discuss safeguarding concerns. If they are not available, deputy DSL will be made available.
- Undergo training to provide them with the knowledge and skills required to carry out this role updated a minimum of biannually.
- Act as a source of support and expertise on matters relating to safeguarding and child protection to ensure that other members of staff can carry out their safeguarding duty.
- Be best placed to advise on the response to safeguarding concerns.
- Identify if children may benefit from Early Help.

- Act as a point of contact with the safeguarding partners.
- Make referrals to Warwickshire’s Multi-Agency Safeguarding Hub (Front Door) where children have been harmed or are at risk of significant harm.
- Be Aware of the requirement for children to have an Appropriate Adult – PACE code C 2019.
- Make referrals to the Channel programme where there is a radicalisation concern and/or support staff that make a referral to Channel.
- Support staff with regards to their responsibilities under the Prevent duty and provide advice and support on protecting children from radicalisation.
- Refer cases to the police where a crime may have been committed.
- Ensure all staff have read and understood Part 1 and/or Annex A of Keeping Children Safe in Education (September 2024).
- Update their knowledge and skills regularly and keep up with any developments relevant to their role.
- Provide staff at Lumen Academy with the knowledge, skills and support required to safeguard children.
- Take responsibility for the accurate and timely recording of safeguarding and child protection concerns and take overall responsibility for safeguarding and child protection files.
- Take responsibility for the transfer of safeguarding files when a child leaves Lumen Academy.
- Attend or ensure an appropriate representative attends multi-agency safeguarding or child protection meetings.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children.
- Work closely with other relevant education professionals (e.g. SENCO, Virtual School Head) to ensure children with additional vulnerabilities are safeguarded;
- Help to promote educational outcomes of child who have experienced or are experiencing safeguarding or child protection issues by sharing relevant information with all other staff.
- Promote a ‘culture of safeguarding’, in which every member of the Lumen Academy acts in the best interests of the child.
- Ensuring Lumen Academy knows who its cohort of children or have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations.
- Regularly meet (every term at a minimum) with the Advisory Board to review safeguarding in Lumen Academy; and
- Liaise with the Principal regarding safeguarding cases and issues.

- Liaise with the senior mental health lead when safeguarding concerns are linked to mental health.

3.3.2 Further details on the role of the Designated Safeguarding Lead can be found in Annex C of Keeping Children Safe in Education (September 2024).

### 3.4 The Role & Responsibilities of all Staff within Lumen Academy Ltd

3.4.1 Lumen Academy staff play a particularly important role because they are in a position to identify concerns early in order to provide help for children. All staff in Lumen Academy.

- Have a responsibility to provide a safe environment, where children can learn.
- Will be able to identify indicators of abuse, exploitation or neglect; with an awareness of safeguarding issues that put children at risk of harm and behaviours associated with these risks.
- Should know what to do if a child tells them that he/she is being abused, exploited or neglected but that children may not feel ready or know how to tell someone that they are being abuse, exploited or neglected and/or recognise their experience as harmful.
- Will be aware of indicators of child-on-child abuse and procedures to deal with this.
- All staff, but especially the DSL and deputy, will also consider whether children are at risk of abuse or exploitation in situations outside their families.
- Will be made aware of; the safeguarding and child protection policy; the Lumen Academy behaviour policy; the staff behaviour policy; information about the safeguarding response to children missing in education; the role of the designated safeguarding lead and systems in Lumen Academy that support safeguarding and child protection.
- Will be provided with a copy of Part 1/Annex A of Keeping Children Safe in Education (September 2024) annually and receive annually updated training on their safeguarding roles and responsibilities.
- Will receive regularly updated safeguarding and child protection training including online safety.
- Will receive safeguarding updates throughout the year as part of continuous professional development. Should be able to contribute to the development of safeguarding policy and practice.
- Will be made aware of the Early Help assessment process and understand their role in it.

- Should be prepared to identify children who may benefit from Early Help and will discuss Early Help requirements with the safeguarding lead in the first instance.
- May be required to support social workers and other agencies following a referral.
- Will be made aware of the process for making referrals to Children's Services (through the Warwickshire Front Door), understand statutory assessments and the role that they may be expected to play in such assessments.
- Should be prepared to make referrals to the Warwickshire Front Door if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments.
- Understands the referral process to the (LADO) and the role they play should they have concerns or allegations are made against any member of staff.
- Should always seek advice from the Designated Safeguarding Lead if they are unsure; and all teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teaching Standards, 2012).

### 3.5 Multi-Agency Working

3.5.1 Lumen Academy is committed to multi-agency working and operates under Working Together to Safeguard Children (2018) and local safeguarding arrangements.

3.5.2 Lumen Academy will work with Children's Services the Police, Health services, local Early Help practitioners and other relevant agencies to promote the welfare of children and protect them from harm.

## 4. Types of Abuse

4.1 As outlined above, all staff will be trained in indicators of abuse, exploitation and neglect and should be able to recognise signs of these. We recognise that abuse, exploitation and neglect along with other safeguarding issues are complex and often multidimensional and therefore don't fall solely under one category. Types of abuse or harm can take many forms including directly inflicting harm on a child or failing to protect a child from harm online as well as face to face both inside and outside of Lumen Academy as well as the multi-faceted occurrence of factors causing emotional harm.

The four main types of abuse that staff are trained to recognise are;

- Physical abuse;
- Sexual abuse;
- Emotional abuse;
- Neglect.

#### 4.2 Types of abuse (Taken from Keeping Children Safe in Education, 2024)

Type of abuse	Information
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.
Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Emotional abuse	The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing

	<p>or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p>
Sexual Abuse	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include noncontact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of this and of the and procedures for dealing with this.</p>
Neglect	<p>The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</p>

4.3 Indicators of abuse can be found in Appendix B.

4.4 If a child is in immediate danger or at risk of harm, a referral will be made to children's services (through the Warwickshire Front Door) and any member of staff can make this referral. A Designated or Deputy Designated Safeguarding Lead should be available at all times, but in exceptional circumstances the member of staff should speak to a member of the Senior Leadership Team or seek advice directly from Children's Service and then take appropriate action. The Designated Safeguarding Lead should be made aware as soon as possible.

4.5 Staff, parents and the wider community should report any concerns that they have about the welfare of children, however minor or seemingly insignificant. Staff should not assume that someone else will report concerns.

4.6 Lumen Academy recognises that any child can be the victim of abuse and may benefit from Early Help. However, Lumen Academy staff will be particularly vigilant to potential need for Early Help if a child;

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- **has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;**
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is a risk of modern slavery, trafficking, sexual or criminal exploitation;
- is misusing drugs or alcohol themselves;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is at risk of 'honour-based' abuse such as Female Genital Mutilation or Forced Marriage;
- is persistently absent from education, including persistent absences for part of the academy day.
- is a privately fostered child.

4.7 Lumen Academy recognises that abuse can take many different forms. Staff will also receive training on the following issues and action will be taken if Lumen Academy believes that a child is at risk of or is the victim of;

- bullying, including cyberbullying, prejudice based and discriminatory behaviour;
- child criminal exploitation **and sexual exploitation** (including involvement in county lines);
- child sexual exploitation;
- domestic abuse;
- emotional abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;
- hate;
- mental health;
- neglect;
- peer on peer abuse;
- physical abuse;
- radicalisation;
- relationship abuse;
- serious violence and harassment;
- sexual abuse;
- sexual violence or sexual harassment (including peer on peer abuse);
- sharing of consensual or non-consensual nude and semi-nude images/videos;
- So-called 'honour-based' abuse;
- trafficking and modern slavery.

4.8 Lumen Academy will also take action to protect:

- Children **are absent/ missing** education;
- Children missing from home or care.

4.8.1 There are other familial issues that can have a detrimental impact on children. We work with other agencies in line with Keeping Children Safe in Education (2024) to support children and families in the following circumstances;

- Children facing the court procedures and/or children in the court system;
- Children with family members in prison;
- Children who are homeless;
- Children who need a social worker.



#### 4.9 Children potentially at greater risk of harm

4.9.1 Lumen Academy recognises that some children need a social worker due to abuse, neglect or complex family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.

4.9.2 The Designated Safeguarding Lead will hold information relating to social workers working with children in the academies.

4.9.3 This information will inform decisions about safeguarding and promoting welfare (including the provision of pastoral and/or academic support).

#### 4.10 Children absent/missing from Education

4.10.1 Lumen Academy understands that children who are absent from education for prolonged periods and/or repeat occasions should be treated as a warning sign that children may be being neglected or exploited. For example, neglect, child sexual and criminal exploitation – particularly county lines. This includes children missing from education who are not on roll.

4.10.2 Lumen Academy will report information to the Local Authority when problems are first emerging and if there is a need and always should this result in the removal of a child from roll.

#### 4.11 Elective Home Education

4.11.1 Lumen Academy recognises that many home educated children have a positive learning experience and the decision is one with the child's best interests at heart however elective home education can mean that some children are not in receipt of suitable education.

#### 4.12 Children requiring Mental Health support

4.12.1 Lumen Academy recognises that safeguarding and promoting the welfare of children includes preventing the impairment of children's mental health or development.

4.12.2 All staff will be aware that mental health problems may be an indicator that a child is suffering or is at risk of suffering abuse, neglect or exploitation.

4.12.3 Staff will not attempt to make a diagnosis of a mental health problem unless they are appropriately trained.

4.12.4 We recognise that staff are well-placed to observe behaviour that may indicate that a child is experiencing a mental health problem, or is at risk of developing one. There are clear systems and processes in place for

identifying possible mental health problems. If staff are concerned that a child is suffering a mental health problem, they should:

- speak to the DSL, as identified on page 2 of this policy. DSL's to share the information with the Mental Health First Aider, as identified on page 2 of this policy and/or with the SENDCO (SENDCO to take advice from SEMHL/Education Psychologist, if necessary) and/or Mental Health First Aider.
- DSL's to have a conversation with parents/carers - Referral made to professionals if necessary i.e. GP's, RISE, Social Care, Professional Agencies. - Child to work in Academy with Pastoral Manager.

4.12.5 If staff are concerned that a child is experiencing a mental health problem that is also a safeguarding concern, they must report this to the Designated Safeguarding Lead (or deputy Designated Safeguarding Lead) immediately.

4.12.6 Lumen Academy has a Mental Health First Aider.

4.12.7 Further information, guidance and advice regarding mental health can be found on page 44 of [Keeping Children Safe in Education 2024](#).

#### 4.13 Children who are Lesbian, Gay, Bi or Trans (LGBT+)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

[In line with updated Keeping Children Safe in Education \(2024\) guidance, it is important to consider the Cas review, which identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.](#)

[It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.](#)

[As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual](#)

needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Further guidance for Schools and Colleges in relation to Gender Questioning Children is being consulted on currently by the DfE.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biophobic and transphobic bullying and abuse.

## **5. Responding to Signs of Abuse**

5.1 If a member of staff, parent or member of the public is concerned about a child's welfare, they should report it to the designated safeguarding lead as soon as possible. On occasions when the designated safeguarding lead is not available, it should be reported to the deputy safeguarding lead without delay. Although any member of staff can make a referral to Children's Services where possible there should be a conversation with the Designated Safeguarding Lead.

5.2 If anyone other than the Designated Safeguarding Lead makes a referral to Children's Services or to the police, they should inform the DSL as soon as possible.

5.3 All staff will be alert to indicators of abuse and will report any of the following to the Designated Safeguarding Lead immediately;

- Any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
- Any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories.
- Any significant changes in attendance or punctuality;
- Any significant changes in a child's presentation;
- Any concerns relating to people who may pose a risk of harm to a child; and/or
- Any disclosures/allegations of abuse that children have shared.

5.4 There will be occasions where a child discloses/alleges abuse directly to a member of staff. If this happens, the member of staff will;

- listen carefully to the child and believe what they are saying;
- not promise confidentiality, as information may need to be passed on so the child and family can receive additional support;
- only ask for clarification if something is unclear and will not ask ‘leading’ questions;
- report disclosure to the designated safeguarding lead as soon as possible, certainly by the end of the day;
- only discuss the issue with colleagues that need to know about it; and
- will write up the disclosure and pass it to the designated safeguarding lead. It is likely they will have had a discussion with the DSL prior to this but delay should be avoided.

5.5 The designated safeguarding lead will make a decision about the action that needs to be taken following a member of staff raising a concern about a child or following a direct disclosure recording a clear rationale. The DSL may consider the following options;

- Managing support for the child internally within Lumen Academy;
- Seek advice from the social worker advice line in the MASH;
- Instigate single agency intervention and work directly with the family to improve the situation;
- Offer an Early Help Assessment to provide multi-agency help to a family;
- In cases where children are deemed to be at significant risk of harm, the DSL will refer cases to the Warwickshire Front Door for consideration for statutory intervention. Parental consent will be obtained wherever possible before referring cases to the Warwickshire Front Door. However, if Lumen Academy is worried that telling parents will mean the child is at greater risk of harm, we may do this without informing them.
- If parents do not consent to a referral but the academy believes that a child is at significant risk of harm, a referral will still be made to Children’s Services.

5.6 For further information about the Warwickshire’s ‘Right Help, Right Time’ guidance, which is used by Lumen Academy to make decisions about protecting children, please visit <https://www.warwickshire.gov.uk/children-families/early-help-warwickshire/1>

5.7 See page 24 for flowchart of actions that will be taken where there are concerns about a child (taken from **Keeping Children Safe in Education, September 2024**).

5.8 In cases where members of staff become aware that Female Genital Mutilation (FGM) has been carried out on a female below the age of 18, they have a mandatory duty to report this to the police without delay and will do so. Staff

should refer this to the DSL first, but the legislation requires regulated health and Children's Service professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either;

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth. If you believe a child is at risk of FGM, a referral to the FRONT DOOR is also required.

5.9 Lumen Academy Ltd have a duty to refer any children who are living in a private fostering arrangement to the local authority. Private fostering is when a child under the age of 16 (or under 18 if disabled) is cared for by someone who is not their parent or a close relative. This is a private arrangement made between a parent and a carer, expected to last 28 days or more, or the academy are aware the 28 days has been exceeded.

5.10 All staff at Lumen Academy are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have "due regard" to the need to prevent people from being drawn into terrorism. See Appendix B for further information on the Lumen Academy's Prevent duty.

5.11 If any member of staff is unsure about signs of abuse or neglect, they should speak to the Designated Safeguarding Lead.

## **5.12 Child on Child Abuse**

5.12.1 Lumen Academy understands that both adults and other children can perpetrate abuse, and can happen inside and outside of the academy, online or face to face. Child on Child abuse is taken very seriously and can include bullying (including cyber-bullying, prejudice-based and discriminatory bullying), abuse in intimate personal relationships between children, physical abuse, sharing of consensual or non-consensual images of videos, causing someone to engage in sexual activity without consent, sexual violence and/or harassment, up-skirting, and initiation/hazing ceremonies. The academy recognise that safeguarding issues can manifest as child-on-child abuse. Our Behaviour Management Policy and Child on Child Policy is added on Appendix A and our policies mention sexual violence and sexual harassment and staff undertake training in this area.

5.12.2 All members of staff will be made aware of the Lumen Academy's policy and procedures with regards to child-on-child abuse. Lumen Academy Ltd will ensure staff understand what is

meant by child-on-child abuse by undertaking training both online and throughout the academic year.

5.12.3 Lumen Academy will work to prevent child-on-child abuse by including it at the start of the year training for all staff and ensuring that all staff have read the policy. Any concerns regarding child-on-child will be reported immediately and recorded.

5.12.4 Although it is recognised that if there are no reported cases, such abuse may still be taking place. If an allegation of child-on-child abuse is made, the academy will investigate this by the DSL's investigating this and will talk to the victims and alleged perpetrators, record the incident and, if necessary, will discuss with parent/carers. The victims and alleged perpetrators will work individually and together, if necessary, with the DSL to support them.

5.12.5 In the event that an allegation of child-on-child abuse is made, victims, alleged perpetrators and any other children affected will be supported by the DSL's/Pastoral Manager and Mental Health First Aider. All incidents will be recorded and parents/carers will be spoken to and referral to the Warwickshire Front Door will be considered.

5.12.6 Lumen Academy will never pass off child on child abuse as 'banter', 'having a laugh', 'part of growing up' or other such termination that does not recognise the harm caused. This should be a Zero-tolerance approach as this could lead to a culture of unacceptable behaviours. It is recognised with this, that all child-on-child abuse is unacceptable and will be taken seriously.

5.12.7 Lumen Academy will adhere to guidance set out in [Keeping Children Safe in Education \(2024\)](#) and Sexual Violence and Sexual Harassment in Academies (September 2021) when responding to incidents of child-on-child abuse.

### 5.13 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

5.13.1 Both CSE and CCE are forms of abuse that occur when an individual or group take advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator through violence or threat of violence. CCE and CSE can affect both males and females and can include children that have been moved for the purpose of exploitation (trafficking).

5.13.2 CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, vehicle crime, threatening violence on others or even carrying weapons.

5.13.3 Lumen Academy is responsible for recognising children involved in CCE are victims of exploitation and should be recognised as such due to the harm they have experienced even if they appear to have consented to the criminal activity.

5.13.4 CSE is a form of child sexual abuse including physical contact and non-contact online activities including the internet or by phone. This can happen over time or as a one off and may happen without the child recognising this as abuse or harmful.

#### 5.14 Sharing of consensual or non-consensual nude and semi-nude images or videos

5.14.1 “Sharing of consensual or non-consensual nude and semi-nude images or videos” refers to any sharing of youth-produced sexual imagery between children. This includes;

- A person under the age of 18 creating and sharing sexual imagery of themselves with a peer under the age of 18;
- A person under the age of 18 sharing sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
- A person under the age of 18 being in possession of sexual imagery created by another person under the age of 18.

5.14.2 Lumen Academy has a responsibility to educate children in the risks relating to ‘sharing consensual or nonconsensual nude images or videos’ and how to keep themselves safe online. E-Safety Policy and PHSE Policy are available for staff to access.

5.14.3 Any incidents or suspected incidents of ‘sharing consensual or non-consensual nude images or videos’ should be reported to the DSL without delay.

5.14.4 Once reported to the DSL, the DSL will decide on the appropriate course of action. This could include;

- Referrals to the Warwickshire Front Door in regards to all parties involved (also the police if an urgent response required);
- Confiscation of mobile phones in line with guidance ‘Searching, Screening and Confiscation, (January 2018);
- Support for young people involved to prevent reoccurrence;

- Sanctions in accordance with the behaviour policy;

5.14.5 Any incidents of ‘sharing consensual or non-consensual nude images or videos’ involving the following will result in a referral to Warwickshire’s Front Door and sometimes the Police;

- Adult involvement;
- Coercion or blackmail;
- Children under the age of 13;
- Extreme, or violent content;
- Immediate risk of harm.

5.14.6 Staff will not view images or videos on pupil devices. Confiscated devices will be stored securely and passed to the relevant agencies.

5.14.7 We will work with parents as necessary if their child is involved in the sharing of consensual or non-consensual nude images or videos.

5.14.8 We operate a culture of safeguarding and young people should feel confident to disclose if they have sent an inappropriate image of themselves. Children will always be supported to retrieve and delete the images.

## **5.15 Domestic Abuse**

5.15.1 Domestic abuse can be a single incident or a pattern of incidents. It can also include psychological, physical, sexual, financial or emotional acts of abuse.

5.15.2 Lumen Academy recognises that children can be a victim of Domestic Abuse by seeing, hearing or experiencing the effects or suffering domestic abuse in their own personal relationships. These all have a detrimental impact on children’s health, wellbeing, development and ability to learn. The DSL’s receive alerts from Operation Encompass with guidance from Warwickshire Front Door as to next steps when supporting the children and families.

## **5.16 Searching, Screening and Confiscation**

5.16.1 Where necessary, searching, screening and confiscation will be used to safeguard a child/ children in Lumen Academy.

5.16.2 Lumen Academy adheres to ‘Searching, Screening and Confiscation: Advice for Schools (January 2018).



5.16.3 Information can be found in the searching, screening and confiscation policy.

## 5.17 Online Safety

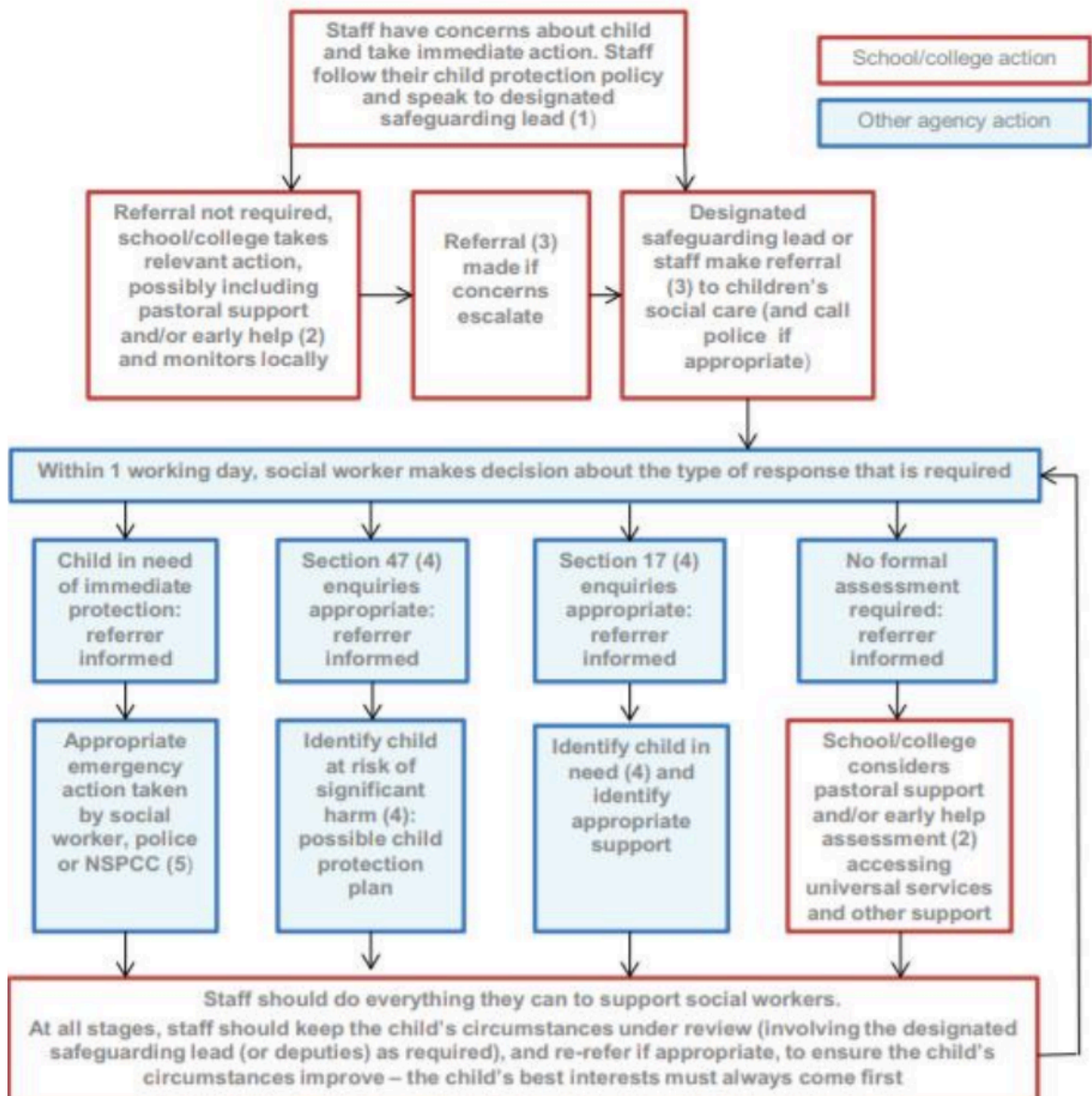
5.17.1 Lumen Academy recognises that in today's world, children need to be safeguarded from potentially harmful and inappropriate online material with many children having unlimited and unrestricted access to the internet via their mobile phone. The breadth of issues can be categorised currently into four areas of risk as taken from Keeping Children Safe in Education 2022:

- Content – being exposed to illegal, inappropriate, or harmful content (pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism)
- Contact – being subject to harmful online interaction with other users (peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit)
- Conduct – online behaviour that increases the likelihood of, or causes, harm (making, sending and receiving explicit images)
- Commerce – risks such as online gambling, inappropriate advertising, phishing and or financial scams

5.17.2 Lumen Academy understand that the above can take place on a student's phone or smart device (including smart watches) whilst at the academy or elsewhere. The academy has responded to this by having a approach to online safety which aims to protect and educate students, parents and staff in their use of technology. For more information the following policies can be read - behaviour management policy, acceptable use policy and E Safety Policy.

5.17.3 Lumen Academy has also established mechanisms to identify, intervene in and escalate any concerns highlighted through our filter and monitoring systems for both staff and students. The effectiveness of this is regularly reviewed with staff aware of how to escalate concerns.

## Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

5.18 To raise concerns about children, members of staff should contact the Multi-Agency Safeguarding Hub (Warwickshire Front Door) by telephone to discuss the referral. They should then complete the online Multi-Agency Contact

(MAC) and submit this to the Warwickshire Front Door. The academy will follow up referrals if we do not receive feedback from Children's Services to ascertain the outcome of all referrals.

Front Door Telephone number: 01926 414144

WARWICKSHIRE FRONT DOOR online referral form: <ask DSL> or email at [TriageHub@warwickshire.gov.uk](mailto:TriageHub@warwickshire.gov.uk)

Out of hours Emergency Duty Team: 01926 886922

Prevent/Channel Referrals: Refer to Local Authority Prevent Officer – Geoff Thomas – 01926412432 or 01926 412338 to contact the administrator for the Community Safety Team. [geoffthomas@warwickshire.gov.uk](mailto:geoffthomas@warwickshire.gov.uk)

5.18.1 If a child's situation does not appear to be improving following a referral, the academy may re-refer the child. **We will also consider using the Warwickshire Safeguarding Children Partnership's Managing Professional Disagreements policy to ensure that our concerns have been addressed and that the situation improves for the child.**

## 6. Record Keeping

6.1 All concerns, discussions and decision made will be recorded in writing and kept confidential and stored securely.

6.2 A written record of all safeguarding and/or child protection concerns, discussions and decisions made will be kept in individual children's files. This will be separate from the main academy file and will only be accessed by the relevant safeguarding staff.

6.3 Lumen Academy keeps all safeguarding files electronically (and some paper)

6.4 Staff will submit all concerns in writing to the DSL at the earliest opportunity. This may be after having a verbal conversation, but conversations will also be followed up in writing.

6.5 In the event that a child moves schools, the safeguarding file will be transferred to the new setting securely and separately from the main school file in a timely manner (**within 5 days for in-year transfers**). Once received by the new school, our academy will not retain the information.

6.6 The academy will seek to hold at least two emergency contacts for every child.

6.7 All data processed by the Lumen Academy is done so in line with the General Data Protection Guidelines and the Data Protection Act (2018). Please see the following policies for additional information; - Data Protection Policy - Data

breach - Freedom of Information Policy - Subject Access Request Policy

6.8 Further information regarding information sharing and data processing in relation to safeguarding can be found in Part One of Keeping Children Safe in Education (September 2024).

## 7. Photography and Images

7.1 Consent from parents to photograph children at academy events for promotional reasons will be sought when the child joins Lumen Academy by completing the admission pack provided by the academy office. All information is also requested annually by the academy office to ensure that all up-to-date information is held about the children.

7.2 Parents can withdraw consent at any time and must notify the academy if they do not wish their child's photographs to be used.

7.3 Photographs of children used publicly will not be displayed with their name or other identifiable personal information.

7.4 Photographs of children will be processed in line with the General Data Protection Regulation.

## 8. Early Help

8.1 Lumen Academy is committed to supporting families as soon as a possible problem arises. It is more effective to support a family through Early Help than reacting to a problem later. Everyone who comes into contact with children and their families and carers have a role to play in safeguarding children. **Lumen Academy is committed to working closely with its neighbouring family hub to work with families in the community to improve outcomes for children.**

8.2 Any child may benefit from early help, but as guided by Keeping Children Safe In Education (2024) all school and college staff will be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care
- Has experience multiple suspensions, is at risk of being permanently

excluded from schools, colleagues and in Alternative Provision or a Pupil Referral Unit.

- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.

## 9. Staff Training

9.1 In order for staff to be able to understand and discharge their safeguarding and child protection duties, Lumen Academy has committed to training staff throughout the academic year. All staff members will be made aware of the Lumen Academy's safeguarding processes and structures and will receive training on these as part of their induction. As part of this training and their annual refresher, they will also receive;

- This 'Safeguarding and Child Protection Policy';
- The staff Code of Conduct
- Copies of Part 1 and/or Annex A of Keeping Children Safe in Education (September 2024)
- Lumen Academy's procedures for Children absent Education
- Lumen Academy's Behaviour Policy

9.2 Staff at Lumen Academy will undertake the following;

- Level 1 Safeguarding (all staff – Teacher Training Days and new staff throughout the year)
- DSL Briefings
- DSL Refreshers
- Team Teach
- Local Authority training
- Advisory Board and Volunteer Training
- Emergency First Aid/First Aid at Work/Paediatric
- First Aid - Mental Health
- First Aid - Prevent Update (all staff)
- Child on Child Abuse (all staff)
- FGM training (before each half term holiday for all staff)
- Online safety training

9.3 Lumen Academy recognise that children may engage in risky behaviours that may put them at additional risk of danger. These can include drug taking, alcohol abuse, truanting and the sharing of consensual or non-consensual nude images or videos. Staff will also be trained in these areas in order to be able to further recognise if a child is at risk of harm.

9.4 All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

## **10. Safer Recruitment**

10.1 Lumen Academy is committed to providing children with a safe environment, in which they can learn. We take safer recruitment seriously and all staff are subject to the following checks;

- Identity check;
- DBS clearance;
- Prohibition from teaching checks (where required);
- Barred List check;
- Section 128 checks (as required - leadership and management);
- Reference check (two references required);
- Professional qualifications check;
- Right to work in the UK check;
- Further checks for those who have lived outside the UK;
- Disqualification Under the Childcare Act 2006 checks (as required); and
- Verification of the candidate's mental and physical fitness may also be sought.

10.2 A record of all checks completed for members of staff will be recorded on the Single Central Record.

10.3 All new members of staff will be required to obtain DBS clearance. Lumen Academy reserves the right to re-check DBS clearance for any member of staff where information is received that indicates they may pose a risk to children and may request candidates to register on the DBS update service.

10.4 At least one member of every interview panel will have undertaken Safer Recruitment training which it is recommended is refreshed every 2 years.

10.5 We take proportionate decisions on whether to check individuals above and beyond what is legally required dependant on individual circumstance.

10.6 Any visitor to the academy who has not been subject to the necessary checks will be supervised at all times and a risk assessment completed.

10.7 All safer recruitment practices at Lumen Academy comply with Keeping Children Safe in Education (September 2024). See Part 3 of Keeping Children Safe in Education (September 2024) for further information. See Safer Recruitment policy for further details.

## 11. Allegations of Abuse Against Staff

11.1 Lumen Academy takes all safeguarding matters including low level concerns and/or allegations that harm to a child has occurred against staff (including agency, volunteers and contractors) seriously and will manage them in line with this policy, Part Four of Keeping Children Safe in Education (September 2024) and the CSCP Guidance, 'Allegations Against Staff and Volunteers'.

11.2 Allegations or concerns may include

- Staff having behaved in a way that has harmed a child, or may have harmed a child;
- Staff possibly committing a criminal offence against or related to a child;
- Staff behaving towards a child or children in a way that indicates that he or she may pose a risk of harm to children; or
- Staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children (including behaviour outside of work). This is known as 'Transferable risk'.

11.3 If a concern or allegation of abuse arises against the Principal, or should there be a conflict of interest to the Principal, it must be immediately reported to the Advisory Board and to the LADO.

11.4 If a concern or allegation of abuse arises against any member of staff, supply teacher, volunteer or contractor other than the Principal, it must be reported to the Principal without delay.

11.4.1 The Yellow Form - This form should be used for recording and reporting all allegations of abuse by and all concerns about the behaviour of staff and volunteers that are in breach of the Staff Code of Conduct. This includes any concerns about the staff and volunteer's mental health. All allegations and all such concerns must be reported to the Principal without delay. There are paper copies of the yellow form in reception



11.5 Concerns or allegations of abuse against staff must be reported to the Principal or Advisory Board as appropriate and not discussed directly with the person involved.

11.6 The Principal or the Advisory Board should consider if the concern or allegation meets **the harms threshold as outlined in Working together to Safeguard Children (2023) guidance indicating that a person in a Position has:**

- **behaved in a way that has harmed a child, or may have harmed a child**
- **possibly committed a criminal offence against or related to a child**
- **behaved towards a child or children in a way that indicates they may pose a risk of harm to children**

If they feel the criteria is met then they should refer into the Warwickshire LADO using the online referral form. The Principal or Advisory Board members can also seek guidance/advice if unsure by emailing the LADO.

‘Low-level’ concern does not mean it is not significant. This is a term used for any concern (no matter how small) that an adult working with a child may have breached the staff Code of Conduct and does not meet the harm threshold. Examples of which may include:

Being overly friendly with children Having favourites Taking photographs of children on their mobile phone Engaging with a child on a one-to-one basis in a secluded area or behind a closed door. Or; humiliating pupils.

11.7 Concerns relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. In accordance with **Keeping Children Safe in Education 2024**, the academy will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

11.8 If a child has suffered or may have suffered abuse or harm, a Warwickshire Front Door referral will also be made.

11.9 In the instances where an allegation is dealt with internally, the Local Authority designated officer will provide information and support to the Lumen Academy in managing the allegation.

11.10 A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, irrespective of whether they have resigned.



### **11.11 Supply Teachers and all contracted staff**

11.11.1 Although Lumen Academy does not directly employ supply teachers and contractors, the academy will ensure that any concerns or allegations are referred to LADO and the relevant agency informed as the employer.

11.11.2 Lumen Academy will never cease to use a supply teacher for safeguarding reasons without liaising with the Local Authority Designated Officer and reaching an agreed outcome.

11.11.3 Principal/ Director will liaise with the supply agency to determine whether to suspend or redeploy the supply teacher whilst they carry out their investigation.

11.11.4 Lumen Academy will inform supply agencies of its process for managing allegations, including inviting the agency's human resource manager (or equivalent) to meetings and regularly updating agencies on relevant Lumen Academy policies. Lumen Academy will usually take the lead because agencies do not have direct contact with children or staff, so will not be able to gather information.

### **11.12 Advisory Board**

11.12.1 If an allegation or concern is about a member of the Advisory Board, Lumen Academy will follow local procedures.

### **11.13 Volunteers**

11.13.1 Risk assessments and a DBS check will be requested for all volunteers. Under no circumstances will a volunteer prior to satisfactory checks being completed be alone with children unsupervised or allowed to work in regulated activity.

### **11.14 Whistleblowing (Speak Up)**

11.14.1 Lumen Academy operates a culture of safeguarding, and all staff should report any concerns about poor or unsafe practice,

Lumen Academy's safeguarding processes to the senior leadership team.

11.14.2 Appropriate whistleblowing (Speak Up) procedures are in place whereby the senior leadership team will take all concerns seriously.

11.14.3 In the event that a member of staff is unable to raise an issue with senior leadership in Lumen Academy, they should refer to Part 1 of Keeping Children Safe in Education for additional guidance on whistleblowing procedures.

**11.15 Complaints Procedure** – Lumen Academy operates a complaint procedure which will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the

threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by the Principal, other members of the senior leadership team and Advisory Board. Complaints from staff are dealt with under the academy's complaints and disciplinary and grievance procedures. (Also refer to Low level concerns)

Complaints which escalate into a child protection concern will automatically be managed under the academy's child protection procedures.

## **12. Promoting Safeguarding and Welfare in the Curriculum**

12.1 Lumen Academy recognises the importance of teaching children how to stay safe and look after their mental health and are committed to equipping children with the skills and knowledge to have successful and happy lives.

12.2 Lumen Academy will teach children about safeguarding, including online safety across the curriculum:-

- Protective Behaviours
- E-Safety
- External visitors will be invited to work with the children dependent on relevant issues
- DSL's will ensure that any concerns about safeguarding are up-to-date, relevant and included in the curriculum for all ages

12.3 Lumen Academy plays a crucial role in preventative education. Preventative education is most effective in the context of an academy approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, bi-phobic and sexual violence/harassment.

Lumen Academy will have a clear set of values and standards, upheld and demonstrated throughout all aspects of academy life. These will be underpinned by the academies behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum (RSHE). Lumen Academy will follow the RSE national curriculum provided by the Government which ensures that all aspects of preventative education are covered.

12.4 Education at home and remote education. Please see Addendum C which sets out the safety when children are educated at home as well as all staff have access to the Lumen Academy Remote Learning Policy which is available on the academy's website.

## 13. Children Looked After

13.1 The most common reason for children to be looked-after is because they have experienced abuse and/or neglect. Lumen Academy recognises that children looked after may have additional vulnerabilities by virtue of this.

13.2 Staff will receive training on how to best safeguard children who are Looked-After and who have been Previously Looked-After.

13.3 Lumen Academy will work with Personal Advisors when children leave care (where applicable).

13.4 Lumen Academy is committed to working with other agencies to ensure the best outcomes for Looked-After and Previously Looked-After children.

## 14. Children with Special Educational Needs and Disabilities (SEND) or Physical Health Needs

14.1 As outlined in Keeping Children Safe in [Education \(2024\)](#), Lumen Academy is aware that children with additional needs or disabilities may be more vulnerable to abuse both online and offline and additional barriers may exist when recognising abuse and neglect. This could be because;

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEN and disabilities or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.
- Being unable to understand the difference between fact and fiction in online content

14.2 Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead and SENCO. Staff will also be trained in recognising signs of abuse in children with SEN and disabilities or certain medical conditions.

14.3 Staff will take into account the needs of a child when responding to concerns of abuse or when taking a disclosure. We recognise that some children

require specialist intervention to communicate and advice from the SENCO will be sought in these circumstances.

14.4 Safeguarding learning opportunities within the curriculum will be appropriately differentiated to ensure all children can access it.

## **15. Use of Reasonable Force**

15.1 There may be occasions when staff are required to use reasonable force to safeguard children. We will not use any more force than is proportionate and necessary. Lumen Academy trains staff to use Team Teach. This means that the trained staff use the strategies according to their training and, all incidents are recorded. The Principal will ensure that there is a follow up conversation with those involved with the use of Team Teach once the child is regulated. In order to de-escalate a child's behaviour, the techniques learnt from Team Teach are used and are also taught to all staff and especially by using the techniques to de-escalate using their knowledge of training which they have received through various trainings.

## **16. Work Experience**

16.1 All students participating in work experience will have an initial meeting with the Principal or a senior member of staff before they start their placements. They will then meet with the Pastoral Manager and receive safeguarding and health and safety training before their placement starts. Lumen Academy will continue to be responsible for the safeguarding of the students. Written confirmation from the provider that appropriate safeguarding checks have been carried out will be sought on individuals working at the establishment, i.e. those checks that the academy would otherwise perform in respect of its own staff.

16.2 The DSL will continue to have oversight of all pupils accessing any part of Lumen Academy or delivery online or offsite. The DSL will ensure that robust arrangements are in place for timely and effective information sharing of safeguarding information between the Lumen Academy and the other education provider(s).

16.3 The DSL will also take responsibility for ensuring that robust procedures are in place to confirm attendance and to enable the swift reporting of non-attendance and children going missing from our provision at any time when they should be with us.

## **17. Summary**

Lumen Academy is committed to safeguarding children and will always make safeguarding decisions that are in the best interests of each child. For further information or if you have any queries about this policy, please contact the academy.

## Appendix A – Key Policies

Lumen Academy’s safeguarding policy is intended to be used in conjunction with the following policies. A copy of any policy is available on the Lumen Academy website. Lumen Academy adheres to Coventry Safeguarding Children Partnership Policies, which can be found here:

- Allegations Against Supply Staff or Volunteers (CSCP)
- Allegations Against Members of Staff
- Anti – Bullying Policy
- Anti-Discrimination and Harassment Policy
- Attendance Policy
- Behaviour Policy
- Children/Young people with Medical Needs - Management of Medication and Managing – Preventing Illness.
- Children Missing in Education Procedures
- Complaints Policy
- Critical Incident Plan
- Data Protection Policy and Privacy Notice
- Drugs and Alcohol (referred to in Behaviour Policy and Staff Code of Conduct)
- Equalities Policy
- E-Safety Policy (including the filtering and monitoring system - SENSO)
- Managing Professional Disagreements (CSCP)
- Health & Safety Policy
- HR & Governance Policy
- Intimate Care Policy
- IT Policy
- Lone Working Policy/Home visits policy
- Medicine & First Aid Policy
- Mental Health and Wellbeing Policy
- Positive Handling Policy
- PSHE Policy
- Safer Recruitment Policy
- SEND Policy
- Staff Code of Conduct
- Trips and Visits Policy
- Visitor Management Policy (including external speakers information)
- Whistleblowing Policy
- Work Mobile Phone Use

## Appendix B – Further Safeguarding Information

### **Types of Abuse**

As outlined in paragraph 4.4, Lumen Academy will take action if we believe a child is at risk of or is suffering from abuse. Abuse is not limited to physical, emotional, sexual abuse and neglect. For further information on the definitions of the types of abuse below, please refer to [Keeping Children Safe in Education \(2024\)](#), Annex A.

See below for policy information relating to other key safeguarding issues. All decisions taken in responding to concerns of abuse will be taken in the best interests of the child.

### **Bullying, including cyber- or online-bullying**

Lumen Academy takes all forms of bullying seriously and will respond sensitively and quickly to any reported bullying. Children should report any bullying to their mentor, to the DSL or to any trusted member of staff and we will work to resolve it. We also teach children about the dangers of bullying through our curriculum and evidence to this can be seen on our websites.

Bullying can take many forms and we have several policies that cover different aspects of bullying. Please see the Anti-Bullying Policy, the Behaviour Policy and paragraph 5.8 of this policy for further information.

### **Child criminal exploitation (including involvement in county lines)**

Lumen Academy is aware that criminal exploitation involves exploitative situations, contexts and relationships where young people (or a third person or person) receive ‘something’ (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them completing a task on behalf of another individual or group of individuals’ this is often a criminal nature. Child criminal exploitation often occurs without the child’s immediate recognition, with the child believing that they are in control of the situation. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.

We at Lumen Academy will ensure that when delivering safeguarding training that we inform staff that criminal exploitation is also known as ‘county lines’ and is when gangs and organised crime networks exploit children to sell drugs. Often these children are made to travel across counties, and they use dedicated mobile phone ‘lines’ to supply drugs. Lumen Academy Behaviour and Discipline Policy and ethos about educating children and young people around risks and crime.

Lumen Academy DSL attends regular briefings from the Warwickshire regarding any updates involving criminal exploitation and then disseminates to all staff with a reminder of their responsibility to refer any concerns in the appropriate manner.

## **Domestic abuse**

The impact of Domestic abuse on children and their families is taken seriously throughout Lumen Academy and during the safeguarding training the effect on the children is highlighted to all staff.

Lumen Academy uses Operation Encompass, which is a unique Police and Education early intervention safeguarding partnership, which supports children and young people, exposed to domestic abuse.

Operation Encompass reports to academy before the start of the next academy day when a child or young person has been involved or exposed to a domestic abuse incident the previous evening.

The information is given in strict confidence to the DSL to enable support to be given dependent on the needs and wishes of the child and at the direction of the MASH (Multi Agency Safeguarding Hub). Operation Encompass is a Trauma informed and Trauma sensitive charity who acknowledge and understand the impact of Domestic Abuse as an Adverse Childhood Experience (ACE).

Operation Encompass mitigates against the damage caused by exposure to Domestic Abuse and other ACE's (Adverse Childhood Experiences).

## **Fabricated or induced illness**

Lumen Academy is aware that fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Staff are made aware of this type of child abuse and are made aware of the seriousness of this issue during their safeguarding training and, understand the appropriate way to report any concerns.

## **Faith-based abuse**

The term 'belief in spirit possession' is the belief that an evil force has entered a child and is controlling him or her. Sometimes the term 'witch' is used and is the belief that a child is able to use an evil force to harm others. There is also a range of other languages that is connected to such abuse. This includes black magic, kindoki, ndoki, the evil eye, djins, voodoo, obeah, demons, and child sorcerers. In all these cases, genuine beliefs can be held by families, carers, religious leaders, congregations, and the children themselves that evil forces are at work. Families and children can be deeply worried by the evil that they believe is threatening them, and abuse often occurs when an attempt is made to 'exorcise', or 'deliver' the child. Exorcism is the attempt to expel evil spirits from a child. (Safeguarding Children from Abuse Linked to a Belief in Spirit Possession 2007). The belief in 'possession' or 'witchcraft' is widespread. It is not confined to certain countries, cultures, or religions, nor is it confined to new immigrant communities in this country.

Any concerns about a child, which arise in this context, must be taken seriously and reported to the DSL's urgently and a referral will be made to Children's Social Services.

### **Female genital mutilation (A form of so-called 'honour-based' abuse)**

Lumen Academy staff receive training regarding FGM during their safeguarding training at the start of the academic year and throughout the year, especially near to academy holidays. All staff are aware that it is their responsibility to make a referral directly to the Police and Children's Social Care and also that they must inform the DSL and follow Lumen Academy's procedures.

### **Forced marriage (A form of so-called 'honour-based abuse)**

A forced marriage is a marriage in which one or both of the parties are married without her/his consent or against her/his will. Forced marriage is different from an arranged marriage in which both parties' consent to the assistance of the parents/family or a third party in identifying a spouse. Lumen Academy's ethos is to ensure that pupils understand and respect one another regardless of age, gender, or sexual orientation. Lumen Academy does this through its Behaviour and Discipline Policy, Anti-Bullying Policy, E-Safety Policy as well as their close working relationship with the Police, Local Authority Attendance Officer, Behavioural Support and Children's Social Services.

### **Gangs or youth violence**

Lumen Academy has a duty and responsibility to protect the children in its care and increasingly recognises that where early warning signs that younger children may be at risk of getting involved in gangs can be spotted. Crucial preventative work is done and will be done with all children to prevent negative behaviour from escalating and becoming entrenched. Our curriculum in PSHE and ICT are undertaken as well as links with outside speakers to enrich our student's knowledge so they help to improve the children's social and emotional skills, understanding risk, exploring how to stay safe and make safe choices.

### **Gender-based violence**

Lumen Academy treats gender-based violence as serious, is supported by its Anti-Bullying Policy, Behaviour and Discipline Policy and Child Protection and Safeguarding Policy and will respond promptly and effectively to any incidents. The pupils will receive information through the curriculum, group discussion as well as yearly events to provide understanding that everyone should be treated with respect. Lumen Academy will build a close working relationship with parents/carers to ensure support with behaviour.

### **Hate**

Lumen Academy is aware that a hate crime in any incident carried out against a person because of their sex, race, religion, disability or sexual orientation. It can include:

- Verbal abuse and harassment
- Threats and intimidation
- Physical assault and violence, including sexual violence
- Property damage
- Graffiti



- Offensive mail

If a person has suffered – or witnessed – a hate crime they can call the police on 1010, report and emergency or call 999 and ask for the Police. If it is a child who is being harassed and a disclosure is made then it is important to listen to the child and follow procedures as set out in the Child Protection and Safeguarding Policy and inform, the parent/carer and if necessary, contact Children’s Social Services.

### **Homelessness**

Within Lumen Academy, staff are made aware through their ongoing training, that there may be times when families of children who attend may be in the situation where they either are made homeless or are threatened with homelessness. If staff have any concerns about children in their care, then it is important to refer the issue to the DSL who will in turn make appropriate enquires to support the family in need.

(So-called) ‘Honour-based’ abuse (For FGM and Forced Marriage, types of so-called ‘honour-based’ abuse, see above)

Lumen Academy understands that Honour based violence is a crime or incident which is often committed to protect or defend the so called ‘honour’ of a family and/or community. Crimes of so called ‘honour’ do not always include violence, crimes committed may include:

- Domestic abuse
- Threats of violence
- Threats to disown
- Sexual abuse
- Psychological/emotional abuse, for example “Your grandma wants to see you marry before she dies”; “I will kill myself if you bring shame to our family by not getting married”, “If you don’t marry him then your sister will have to”.
- Forced marriage
- Being held against your will or taken somewhere where you do not want to go (often to another country)
- Surveillance and harassment.

If a staff member receives a disclosure from a child about themselves, a sibling, or another child then it is their responsibility to follow the procedures set out in the Child Protection and Safeguarding Policy. Any updates relating to so called honour-based violence then this information will be disseminated among the staff.

### **Radicalisation and Extremism**

Lumen Academy is fully committed to safeguarding and promoting the welfare of all its pupils. Every member of staff recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today’s society. Tackling Extremism and Radicalisation Policy sets out our beliefs, strategies and procedures to protect vulnerable individuals from being radicalised or exposed to

extremist views, by identifying who they are and promptly providing them with support.

All staff will take part in the Safeguarding training at the start of the new academic year which will include Prevent training and the Academy works closely with the Prevent Education Officers who support through training to the DSL. All staff will undertake annually the Prevent e-learning annually and will receive updated training throughout the year. Within their training staff will understand:

- That academy is subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 to prevent people from being drawn into terrorism.
- That we promote British values and tolerance keeping children safe from the dangers of radicalization and extremism.
- That we prevent and tackle discriminatory and derogatory language – this includes language that is derogatory about disabled people and homophobic and racist language.
- Signs to look out for including use of extremist language or symbolism, sharing of extreme views, changes in behaviour or looking up extremist content online. Young people should be encouraged to talk openly about views so that issues can be addressed.
- Far right extremism and ultra-right extremism and ‘Islamic’ extremism are the most prevalent in the West Midlands.

Lumen Academy has ensured that all it has undertaken the Prevent Toolkit, which is updated annually and staff have ensured that they have completed the relevant Checklist and Risk Assessment individually.

### **Relationship Abuse**

Lumen Academy is aware that any abuse in relationships is extremely serious, and staff are advised to follow the referral procedures as set out in the Child Protection and Safeguarding Policy. All concerns are logged and are passed onto the DSL’s who will make a referral if necessary.

### **Serious Violence**

Staff within Lumen Academy are aware of the indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from academy, 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 possession could also indicate that children have been approached by or are involved with, individuals associated with criminal networks or gangs.

### **Sexual violence or sexual harassment (including peer-on-peer abuse)**

Staff within the Lumen Academy are asked to refer to the following policies if there is a concern regarding sexual violence, sexual harassment or sharing of consensual or non-consensual nude images and videos:

- Child Protection and Safeguarding Policy
- Peer on Peer Abuse

- Whistleblowing Policy
- Working alone with children
- Hospitality Policy
- Allegations against staff
- Safe Touch Policy
- Prevent
- Tackling Extremism Policy

### **Trafficking and modern slavery**

Lumen Academy is aware that trafficking and modern slavery is a serious issue and Lumen Academy the Behaviour and Discipline Policy sets out how people should be treated and how they should treat others. Lumen Academy's ethos is also about educating children and young people around risks, crimes and how to keep themselves safe. If, however, staff receive any concerns about a child it is their 'duty of care' to refer the issue to the DSL and in turn to the Children's Social Care.

Children **absent/missing** from education, home or care  
Lumen Academy will also take action to protect;

- Children **absent** education
- Children missing from home or care

### **Children Absent from Education**

Lumen Academy understands that staff have a 'duty of care' for any children **absent** from education, home or are vulnerable and it is their responsibility to ensure that children are attending academy regularly. It is important that all staff are aware of the Attendance Policy, Missing Child Policy and **Child Absent / Missing in Education** Policy and that there is regular communication between the staff.

The Pastoral Lead will follow the safeguarding procedures as set out in the Children **Absent** in Education Policy in order to identify where the child is.

**CME processes remain the same in Warwickshire with the CME pathway to be followed when reporting that a child has been removed from roll, aware a child is not on the academy roll or if child has not been seen by academy staff for a while (i.e. unsuccessful home visits or being informed the child has moved abroad). This is overseen by CME@warwickshire.gov.uk with the following form <https://api.warwickshire.gov.uk/documents/WCCC-205639421-349.docx> needing to be completed and submitted to Warwickshire Local Authority.**

The Attendance Policy, Missing Child Policy and Child **Absent** in Education Policy is kept on the website.

Our procedures are:-

- Staff contact home
- Pastoral lead contact home and other family members or friends identified on admission forms

- Pastoral Lead talk to friends of children/family
- Home visit
- **Contact Principal**
- **Pastoral lead to follow appropriate pathway (CME or Attendance)**
- Check admissions at the Local Authority to find out if family have moved
- Contact GP of family

### **Children Missing from home or care**

Any children missing from home or care will be dealt with in the same manner as above however, extra steps will be taken where, if the child is in care then the Social Worker will be informed as well as the Police. The Attendance Policy, Missing Child Policy and Child **Absent in** Education Policy is kept website.

### **Private Fostering**

Lumen Academy have a duty to refer any children who are living in a private fostering arrangement to the local authority.

We will do this through a Warwickshire Front Door referral. It is important that parents/carers inform us if a child is going to be staying at an alternative address to that of their primary care-givers for more than 7 days/1 week. The legislation states that 28 days is the maximum as set out in the policy in 5.9.

### **Indicators of abuse**

See below for possible indicators of abuse. (Taken from What to do if you are worried a child is being abused, 2015)

- Children whose behaviour changes – they may become aggressive, challenging,
- disruptive, withdrawn or clingy, or they might have difficulty sleeping or start
- wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends,
- without an obvious reason;
- Children who don't want to change clothes in front of others or participate in
- physical activities;
- Children who are having problems at school, for example, a sudden lack of
- concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with
- strangers;
- Children who reach developmental milestones, such as learning to speak or walk
- late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late
- being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of
- drugs;

- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

The academies recognise that the above list of indicators is not exhaustive and staff will receive training on indicators of abuse.

## APPENDIX C – REMOTE EDUCATION/ HOME LEARNING

This Appendix is to ensure appropriate communication, between home and academy. It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in the Academy's code of conduct.

- ✓ All online educational accounts are linked to academy's email addresses
- ✓ Expectations around the frequency of home/academy communicate set. A teacher's feedback, for children who have uploaded work and/or posted any queries will be added each week. There is no specific part of the week this should be completed, so this can be responsive to children's postings, but it should be within the normal working day of 8.30am – 4.30pm.
- ✓ One additional teacher posting each week. This might be the teacher reading a story, a class challenge or a link to a news article or particular event happening around the country – e.g. Easter.
- ✓ Guidance given on appropriate length and tone of responses in Home Learning Expectation.

Below are some things to consider when recording video-clips, especially where webcams are involved.

- ✓ No live streaming.
- ✓ Staff and children must wear suitable clothing, as should anyone else in the household.
- ✓ Any computers used should be in appropriate areas, for example, not in bedrooms.
- ✓ Language must be professional and appropriate, including any family members in the background.
- ✓ Staff must only use platforms provided by Lumen Academy to communicate with pupils.
- ✓ Concerns around pupil or parent home/academy communication should be sent to the Principal during the next working day.

### Logging a concern about the behaviour of a member of staff or volunteer

(N.B. This form should be used for recording and reporting all allegations of abuse by and all concerns about the behaviour of staff and volunteers that are in breach of the Staff Code of Conduct. This includes any concerns about the staff and volunteer's mental health. All allegations and all such concerns must be reported to the Principal without delay)

About the member of staff or volunteer whose behaviour is causing concern or is subject of the allegation:

Name (print):

Job Title (print):

Date (of writing this record):

Time (of writing this record):

About the person reporting the concern/allegation and completing this form:

Name (print):

Job Title (print):

Signature:

What is the nature of the specific allegation or concern about behaviour (brief headline)?

Record the following factually:

When? (date and time of incident);

What? exactly has raised your concern (what happened, what did you see/hear/find out or what were you told);

Where did your concerns arise?

Who else – were any pupils or other staff present or involved?

N.B. Please record any direct disclosures/statements/allegations/comments using the child or adult's exact words in quotation marks.

N.B. If additional pages are used, these must be attached securely to this form.

Did you do anything or speak to anyone else before reporting the incident/concern to the Principal

(if yes, please provide names and details)?

Any other relevant information:

Date and time incident/concern was first shared with Principal

N.B. It is not necessary to complete this form before speaking to the Principal - the circumstances may mean you need to speak to the Principal first as a matter of priority:

Check to make sure your report is clear; and will be clear to someone else reading it next year.

NOW PLEASE PASS THIS FORM TO THE Principal\*  
(Principal\* to complete sections overleaf)

\*In the event that the allegation/concern is about the Principal, this form must be passed to the Advisory Board, who should complete the second part of the form.

(Following sections to be completed by Principal\*)

Time and date information received by Principal*, and from whom	
Action taken (e.g. discussion with LAdo, advice taken from HR/Legal/Advisory Board).	
Date, time, name, role, organisation advice provided by.	
If decision not to refer to LAdo, state reason	
Parents informed? Yes/No  State reasons if No	
Outcome (e.g. Referral to LAdo, meeting convened, HR advice taken, Police investigation, internal investigation, informal management advice given and recorded, no further action)	
Signed	
Printed Name	
Date	

Signature, date and time when member of staff submitting this form received confirmation of receipt of report/allegation from Principal*
--



## 1 Managing low level concerns

1.1 This part of the policy will be followed when dealing with low level concerns raised in relation to members of staff, including supply staff, contractors or volunteers and may be adapted to each case as required. It will be used alongside the Academy's complaints procedure, child protection and safeguarding policy, code of conduct and disciplinary procedure.

1.2 The academy promotes a culture in which all concerns about all adults working in or on behalf of Lumen Academy (including supply teachers, contractors and volunteers) are addressed appropriately.

1.3 This policy is designed to:

- 1.3.1 promote and support a culture of openness and trust where staff are clear about the behaviours expected of themselves and their colleagues
- 1.3.2 ensure staff are comfortable to raise low-level concerns; and
- 1.3.3 provide for efficient and proportionate handling of those concerns

## 2 Recognising low level concerns

2.1 This policy will be used to manage 'low-level' concerns, defined in Part 4 of Keeping Children Safe in Education 2022 as any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- 2.1.1 is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- 2.1.2 does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

2.2 Examples of such behaviour could include, but is not limited to:

- 2.2.1 being over friendly with children;
- 2.2.2 having favourites;
- 2.2.3 taking photographs of children on their mobile phone;
- 2.2.4 engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or

2.2.5 using inappropriate sexualised, intimidating or offensive language.

### **3. Sharing low level concerns**

3.1 For our culture of openness and trust to prevail, all staff should share any low level concerns they have. Serious Case Reviews and Safeguarding Practice Reviews have often evidenced how low level concerns felt and/or expressed by staff relating to individuals who were later found to have sexually abused children at a school were not recorded. When they are not recorded, they cannot be reviewed or studied for patterns of behaviour.

3.2 To minimise and hopefully eradicate the risk of those opportunities being missed, it is critical that staff understand their role in identifying and reporting low level concerns.

3.3 All staff are encouraged to immediately report low level safeguarding concerns as defined in this policy so that the identified behaviours can be investigated and managed appropriately.

3.4 All low level concerns in relation to staff, supply staff, contractors or volunteers should be reported immediately to the Principal. Concerns about the Principal should be reported to the Advisory Board.

3.5 The procedure for reporting low level concerns is consistent with that for reporting allegations of abuse as set out in part one of this policy. Staff do not need to determine whether their concern meets the threshold set out in part one of this policy or is a low level concern. The Principal (as appropriate) will make this determination once the staff member has reported the issue.

### **4 Responding to low-level concerns**

4.1 The Principal will review the concern to confirm that it is not a more serious issue that should be dealt with under part one of this policy. An issue reported as a low level concern would be dealt under part one of this policy where it meets the threshold set out in part one or there is a pattern of low level concerns expressed about the individual or wider staff practices generally. If necessary, the Principal will discuss the concern with the LADO to determine whether it should be dealt with under part one of this policy.

4.2 The Principal will discuss the concern with the individual who raised it and will investigate it as appropriate.

4.3 Most low-level concerns are likely to be minor and can be dealt with by means of management support or additional training. Where necessary, action may be taken in accordance with the Academy's code of conduct and disciplinary procedure.

4.4 If the concern has been raised via a third party, the Principal will collect evidence by speaking directly to the person who raised the concern (unless it has been raised anonymously), the individual involved and any witnesses.

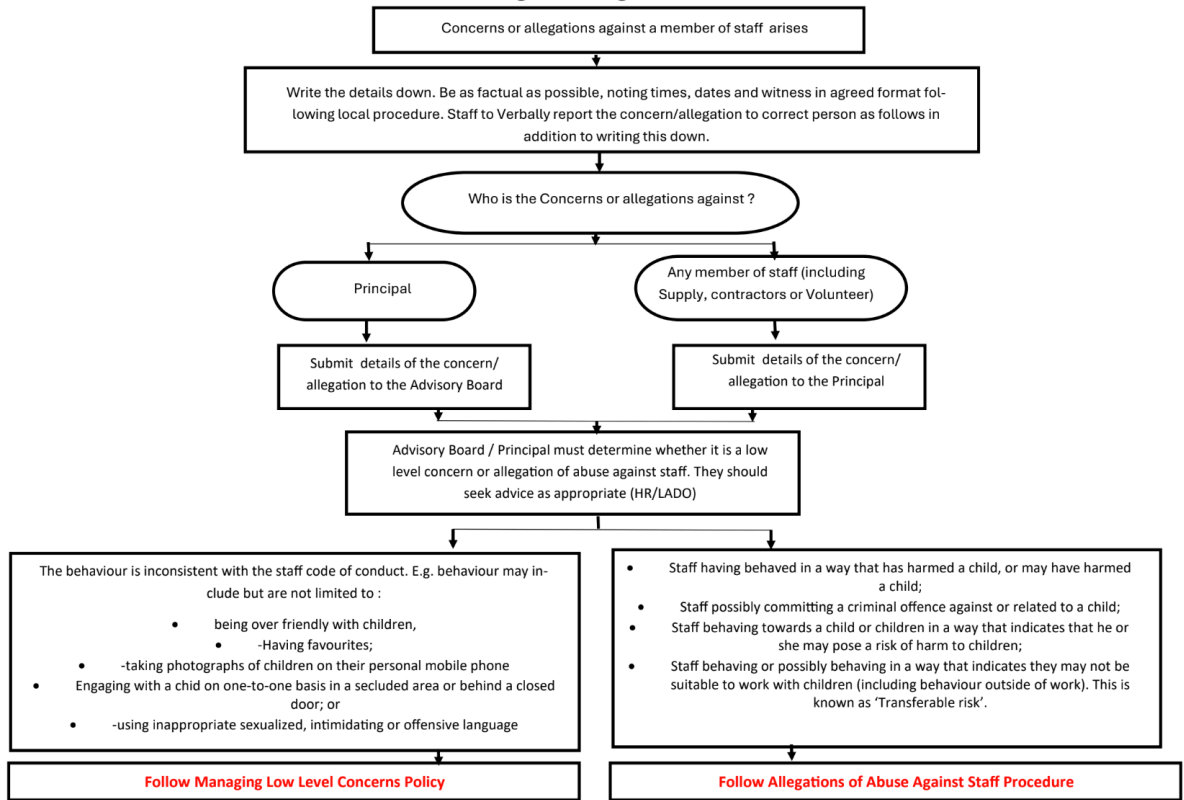
4.5 Where a low level concern is raised about a member of supply staff or a contractor, the concern will be shared with supply agency so they can take appropriate steps in accordance with their own policies and statutory guidance.

#### Recording low-level concerns

4.6 All low-level concerns will be recorded in writing and will include details of the concern, the context and action taken. The records will be kept confidential and held securely in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.

4.7 Records of low-level concerns will be reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. If patterns are identified, the Academy will decide on an appropriate course of action and will refer the matter to the LADO where the behaviour moves from a concern to meeting the threshold set out in the first part of this policy. The record of the low-level concern will be kept at least until the person leaves our academy.

### Concerns and Allegations Against Staff Flowchart



Reviewed By:

Monika Sethi

October 2024

Next Review Date:

September 2025

Approved by Director:

23<sup>rd</sup> October 2024

Signed:

Monika Sethi  
Principal and Director