



NINESTILES
ACADEMY TRUST

Safeguarding and Child Protection Policy

Date approved by Trustees	19 th September 2017
Review date*	October 2018

**Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown above and referred to the next academy council meeting*

Role	Name	Training
Principal	James Power	Safer Recruitment Training
Designated Safeguarding Lead (DSL)	Ben Lewis	Safeguarding Training for DSL
Deputy DSL's	Ann Heath/ Marie O'Toole	Safeguarding Training for DSL
Academy Council lead for Safeguarding	Lesley Long	Governor Safeguarding Training
Safer Recruitment Trained	James Power, Jackie McGillicuddy, Vicky Creedon and Sam Finch	Safer Recruitment Training
SENCO	Christa Vines Aimee Clay	SENCo Award
Ninestiles Academy Trust Trustee lead for Safeguarding	Vrigu Dey	Governor Safeguarding Training Completed Prevent Training
Ninestiles Academy Trust DSL	Gaetano Ferrante	DSL Trained

Service	Contact Name	Contact Number
Birmingham Social Services		0121 303 1888
Birmingham LADO		0121 675 1669
Solihull Social Services		0121 788 4333 0121 605 6060 out of hours
Solihull LADO		0121 788 4333
NSPCC FGM Helpline		0800 028 3550
Crime Stoppers		0800 555111

Ninestiles Academy Trust Mission Statement
Strength through Diversity
Ambition through Challenge
Excellence through Curiosity

Policy title	Safeguarding/Child Protection Policy
Rationale	<p>Whilst the prime focus of The Ninestiles Academy Trust is to secure the best educational provision for children and young people, it places the safety and welfare of our pupils and students at the heart of the Trust's culture and ethos.</p> <p>We define Safeguarding as:</p> <ul style="list-style-type: none"> • Protecting children from maltreatment; • Preventing impairment of children's health or development; • Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and • Taking action to enable all children to have the best life chances. <p>We believe:</p> <ul style="list-style-type: none"> • All children have the right to be protected from harm regardless of their race, religion, ethnicity, gender or sexuality. • Children need to be safe and to feel safe in school. • Schools can contribute to the prevention of abuse. • Children need support which matches their individual needs, including those who may have experienced abuse. <p>Our objective is to help keep young people safe by:</p> <ul style="list-style-type: none"> • Providing a safe environment for young people to learn and be successful • Identifying young people who are suffering or likely to suffer significant harm and taking appropriate action with the aim of making sure that they are kept safe both at home and at school. <p>Ninestiles Academy Trust will ensure that all employees and trustees have access to the following documents and that they sign to say they have received, read and understood them:</p> <ul style="list-style-type: none"> • <u>Keeping Children safe in education: information for all schools and college staff (DFE 2016) Part 1 and Annex A.</u> • <u>The Prevent duty: Departmental advice for schools and childcare providers (DfE 2015)</u> • Safeguarding and child protection policy • Staff Code of Conduct <p>Ninestiles Academy Trust will ensure that it fulfils local and national responsibilities as laid out in the following documents:</p> <ul style="list-style-type: none"> • <u>Working Together to Safeguard Children (DfE 2015)</u> • <u>Birmingham Safeguarding Children Board Procedures</u> • <u>Right Service, Right Time: Delivering effective support for children and families in Birmingham Guidance for Practitioners</u> • <u>Prevent Duty (HM Gov 2015)</u> • <u>The Counter Terrorism and Security Act (2015)</u> • Sexting in Schools & Colleges – responding to incidents and safeguarding young people (IKCCIS) 2016

Policy statement	<p>1. OVERALL AIMS</p> <p>1.1 This policy will contribute to the prevention of abuse by:</p> <ul style="list-style-type: none"> • Clarifying standards of behaviour for staff, pupils and students; • Introducing appropriate work within the curriculum; • Developing staff awareness of the causes of abuse; • Encouraging students and parental participation in practice; and • Addressing concerns at the earliest possible stage. <p>1.2 This policy will contribute to the protection of our students by:</p> <ul style="list-style-type: none"> • Including appropriate work within the curriculum; • Implementing child protection policies and procedures; and • Working in partnership with young people, parents and other agencies. <p>1.3 This policy will contribute to supporting our pupils and students by:</p> <ul style="list-style-type: none"> • Identifying individual needs; and • Designing plans to meet needs where possible. <p>2. KEY PRINCIPLES</p> <p>2.1 These are the key principles of child protection work, as stated by Birmingham Safeguarding Children Board:</p> <ul style="list-style-type: none"> • Always put the child first. • Never do nothing. • Do with, not to, others. • Do the simple things better. • Have conversations, build relationships. • Outcomes not outputs. <p>2.2 In addition the Board has identified the following key safeguarding messages for schools:</p> <ul style="list-style-type: none"> • Every child is entitled to a rich and rounded curriculum • Schools operate with public money: this should be spent wisely, targeting resources on the evidenced needs of children now. Assurance and audit are important aspects of this. • Governance is corporate and decisions are collective, but individual governors (Trustees and Academy Councillors) should take the lead on aspects of school life such as safeguarding. • When issues arise, leaders should speak out, addressing them internally where possible and escalating them when this is unsuccessful. <p>3. EXPECTATIONS</p> <p>3.1 All staff and visitors will:</p> <ul style="list-style-type: none"> • Immediately share concerns verbally with the DSL and then follow up in writing as directed by the DSL using referral form and/or CPOMS • Be judicious about what is said, their contact with young people (both physically and through the use of social media) and their actions. • Consider own and young people's vulnerability if holding meetings with individual pupils or students in office spaces and classrooms, particularly after school hours. (Staff should always let someone know that they are holding the meeting). • Report anything that makes them uncomfortable. • Wear their ID badge at all times and challenge anyone without identification. • Be discreet but never promise confidentiality, respecting a young person's privacy. • Be subject to Safer Recruitment processes and checks whether they are new staff, supply staff, contractors, volunteers etc.
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All staff will:

- Complete HAYS online safeguarding training every academic year.
- Be aware of the guidance issued by Birmingham Safeguarding Children Board in Right Service Right Time, and Early Help.
- Be familiar with this policy
- Receive safeguarding training every year. Key staff will undertake more specialist child protection training as required by the Board of Trustees.
- Ensure that temporary staff, volunteers and visitors to the school are made aware of the school's arrangements for safeguarding and their responsibilities.

3.2 Whistle Blowing Code

The Code is intended to help employees in or working with Ninestiles Academy Trust, to raise concerns about possible malpractice(s) at an early stage and in the right way. The Trust would rather employees raised the matter when it is just a concern rather than wait for concrete proof.

If something troubles employees, which they think the Trust should know about or look into, they are advised to use this policy. The Whistle Blowing Code is not for use in relation to personal grievances. The Trust's Grievance Procedure is designed for this purpose. This Whistle Blowing Code is primarily for concerns where the interests of others, or of the organisation, itself are at risk.

4. THE DESIGNATED SAFEGUARDING LEAD

- 4.1 The Designated Safeguarding Lead should be a member of the senior leadership group. Along with the Principal, they are responsible for coordinating all safeguarding and child protection activity.
- 4.2 There should be a trained safeguarding lead on site at all times.
- 4.3 The Designated Safeguarding Lead for child protection will lead regular case monitoring reviews of vulnerable children. These reviews must be evidenced by minutes and recorded in case files.
- 4.4 Where the school has concerns about a child, the Designated Safeguarding Lead will decide what steps should be taken and should advise the Principal.
- 4.5 Child Protection information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child and /or family. A written record will be made of what information has been shared with whom, and when.
- 4.6 Child Protection records will be stored securely in a central place separate from academic records through CPOMS with restricted levels for staff. Individual files will be kept for each child: the school will not keep family files. Files will be kept in line with current data legislation.
- 4.7 Access to these records by staff other than by the Designated Safeguarding Lead will be restricted, and a written record will be kept of who has had access to them and when.
- 4.8 Parents will be aware of information held on their children and kept up to date

	<p>regarding any concerns or developments by the appropriate members of staff. General communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.</p>
	<p>4.9 No disclosure must be made to a parent if this would put the child at risk of significant harm.</p>
	<p>4.10 If a student moves from our school, child protection records will be forwarded on to the Designated Safeguarding Lead at the new school, with due regard to their confidential nature. Transferring schools will forward child protection records to their new destination in their entirety and will not photocopy any documentation contained in the file. Schools are permitted to keep a copy of the chronology sheet for their own records. Contact between the two schools may be necessary, especially on transfer from primary to secondary schools. A record will be made of where, to whom and the date that records have been passed on.</p>
	<p>4.11 If sending by post student records will be sent by “recorded delivery”. For audit purposes, a note of all student records transferred or received should be kept in either paper or electronic format. This will include the child’s name, date of birth, where and to whom the records have been sent, the date sent and/or received.</p>
	<p>4.12 If a student is permanently excluded and moves to a student referral unit, child protection records will be forwarded on to the relevant organisation.</p>
	<p>4.13 Where a vulnerable young person is moving to a further education establishment, consideration should be given to the student’s wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support.</p>
	<p>4.14 When a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face to face handover/exchange of information with the new post holder.</p>
	<p>4.15 In exceptional circumstances when a face to face handover is unfeasible, the Principal will ensure that the new post holder is fully conversant with all procedures and case files.</p>
	<p>5. THE ACADEMY COUNCIL</p>
	<p>5.1 The Academy Councillor with responsibility for Safeguarding is nominated annually. The nominated Academy Councillor is responsible for liaising with the Principal and Designated Safeguarding Lead over all matters regarding child protection issues. The role is strategic rather than operational and the nominated Academy Councillor will not be involved in concerns about individual students.</p>
	<p>5.2 The nominated Academy Councillor will liaise with the Principal and the Designated Safeguarding Lead to produce a termly report for Academy Councillors.</p>
	<p>5.3 The Academy Council will ensure that the school:</p> <ul style="list-style-type: none"> • Has a child protection policy in accordance with the procedures of Birmingham Safeguarding Children Board; • Operates “safer recruitment” procedures and ensures appropriate checks are carried out on all new staff and relevant volunteers; • Has at least one senior member of the school’s leadership team acting as a Designated Safeguarding Lead with responsibility for Child Protection; • Ensures that the Designated Safeguarding Lead attends appropriate refresher training every two years; • Ensures that the Principal and all other staff who work with children undertake safeguarding training every year. Key staff will undertake more specialist child

	<p>protection training as agreed by the Academy Council.</p> <ul style="list-style-type: none"> • Ensures that temporary staff, volunteers and visitors to the school are made aware of the school's arrangements for safeguarding and their responsibilities. • Remedies any deficiencies or weaknesses brought to its attention without delay; • Have procedures for dealing with allegations of abuse against staff/volunteers. • If the Academy Council provides extended school facilities, such as before and after school activities directly under the supervision or management of school staff, the school's arrangements for child protection as written in this policy shall apply. • Where services or activities are provided separately by another body, the Academy Council will seek assurances that the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with the school on these matters where appropriate.
	<p>5.4 The Academy Council reviews its policies/procedures annually.</p>
	<p>5.5 A member of the Academy Council (usually the Chair) is nominated to be responsible for liaising with the local authority and other partner agencies in the event of allegations of abuse being made against the Principal.</p>
	<p>6. WORKING WITH OTHER AGENCIES TO PROTECT CHILDREN</p>
	<p>INVOLVING PARENTS / CARERS</p>
	<p>6.1 In general, the school will discuss concerns with parents/carers before approaching other agencies, and will seek their consent to making a referral to another agency. Appropriate staff will approach parents / carers after consultation with the Designated Safeguarding Lead. However there may be occasions when the school will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.</p>
	<p>6.2 Parents/carers will be informed about the school's child protection policy through letter, website, one to one meetings etc.</p>
	<p>7 MULTI-AGENCY WORK</p>
	<p>7.1 The school works in partnership with other agencies in the best interests of the children. Therefore the school will, where necessary, liaise with the school nurse and doctor, and make referrals to Children's Social Care. Referrals should be made by the Designated Safeguarding Lead to the Child Advice and Support Team (CASS) on 0121 303 1888. Where the child already has a safeguarding social worker, the request for service should go immediately to the social worker involved, or in their absence to their practice supervisor or team manager.</p>
	<p>7.2 The school will co-operate with any child protection enquiries conducted by Children's Social Care. Furthermore the school will ensure representation at appropriate inter-agency meetings such as initial and review child protection conferences, core group meetings and integrated support plan meetings.</p>
	<p>7.3 The school will provide reports as required for these meetings. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting.</p>
	<p>7.4 Where a child in school is subject to an inter-agency child protection plan or a multi-agency risk assessment conference (MARAC) meeting, the school will contribute to the preparation, implementation and review of the plan as appropriate.</p>

	<p>8 THE TRUST'S ROLE IN THE PREVENTION OF ABUSE</p> <p>8.1 The Academy Trust will identify and provide opportunities for children to develop skills, concepts, attitudes and knowledge to promote their safety and well-being.</p> <p>8.2 The Curriculum Relevant issues will be addressed through the SMSC/Aspire curriculum, for example; self-esteem, emotional literacy, assertiveness, power, sex and relationship education, Fundamental British values, e-safety and bullying.</p> <p>8.3 Relevant issues will be addressed through other areas of the curriculum, for example, circle time, English, History, Drama, Art.</p> <p>8.4 Other areas of work All school policies which address issues of power and potential harm, for example: behaviour for learning, bullying, equal opportunities, will be linked to ensure a whole school approach.</p> <p>8.5 The Trust's child protection policy cannot be separated from the general ethos of the school, which should ensure that children are treated with respect and dignity, feel safe, and are listened to.</p> <p>9 THE TRUST'S ROLE IN SUPPORTING CHILDREN</p> <p>9.1 The Trust via the individual schools will offer appropriate support to individual children who have experienced abuse or who have abused others.</p> <p>9.2 Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment. The school will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.</p> <p>9.3 We will ensure the Trust works in partnership with parents / carers and other agencies as appropriate.</p> <p>10 A SAFER SCHOOL CULTURE</p> <p>10.1 Safer Recruitment and Selection The Trust pays full regard to 'Keeping Children safe in education: information for all schools and college staff (DFE 2016) ' with regard to safe recruitment practice. This includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS).</p> <p>10.2 All recruitment materials will include reference to the Trust's commitment to safeguarding and promoting the wellbeing of pupils and students.</p> <p>10.3 Senior leaders responsible for recruitment will have undertaken Safer Recruitment training. (At least one trained leader will be involved in all staff / volunteer recruitment processes and sit on the recruitment panel).</p> <p>10.4 Staff support The Trust recognises the stressful and traumatic nature of child protection work and supports staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead in each individual school and to seek further support as appropriate.</p>
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11 RESPONDING TO ALLEGATIONS AGAINST A MEMBER OF STAFF (APPENDIX 4)

- 11.1 This procedure should be used in any case in which it is alleged that a member of staff, Academy Councillor, visiting professional or volunteer 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; or
 - Behaved in a way that indicates s/he is unsuitable to work with children.
- 11.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in school to abuse children.
- 11.3 All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately. Allegations or concerns about colleagues and visitors must be reported direct to the Principal unless concern relates to the Principal. If the concern relates to the Principal, it must be reported immediately to the Chair of the Academy Council who will liaise with the Local Authority Designated Officer (LADO) and they will decide on any action required.

Allegations or concerns against employees of the Trust Central Team must be reported to the Chair of the Board of Trustees who will liaise with the **Local Authority Designated Officer** in determining the appropriate way forward.

12 RESPONDING TO AN ALLEGATION AGAINST OTHER CHILDREN OR LEARNERS (APPENDIX 3)

- 12.1 This procedure should be used in any case in which it is alleged that a child, or other learner has:
- Behaved in a way that has harmed a child or may have harmed a child; or
 - Possibly committed a criminal offence against or related to a child.
- 12.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for children in school to abuse other children.
- 12.3 All staff working within our organisation must report any potential safeguarding concerns about a child or students behaviour towards other children and young people immediately. Allegations or concerns of a safeguarding nature must be reported directly to the DSL or DDSL.

13 VULNERABLE CHILDREN AND CHILDREN WITH ADDITIONAL NEEDS

- 13.1 Ninestiles Academy Trust recognises that while all children have a right to be safe, some children *may* be more vulnerable to abuse, for example those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.
- 13.2 When considering exclusion, either-fixed term or permanent, of a vulnerable student and/or a student who is the subject of a child protection plan or where there is an existing child protection file, the school will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Academy Council.

14 SAFEGUARDING PUPILS/STUDENTS WHO ARE VULNERABLE TO EXTREMISM

	<p>14.1 Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.</p> <p>14.2 The Ninestiles Trust values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both pupils/students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.</p> <p>14.3 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The Ninestiles Trust is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.</p> <p>14.4 Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 5.</p> <p>14.5 The Ninestiles Trust seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.</p> <p>Risk reduction</p> <p>14.6 Trustees of the Trust, Academy Councillors, Principals and the Designated Safeguarding Leads will assess the level of risk within the Trust and put actions in place to reduce that risk. Risk assessment may include consideration of the Trust's RE curriculums, SEND policy, assemblies, the use of academy premises by external agencies, integration of pupils by gender and SEN, anti-bullying policy and other issues specific to the Trust's profile, community and philosophy.</p> <p>14.7 This risk assessment will be reviewed as part of the annual s175 return that is monitored by the local authority and the local safeguarding children board.</p> <p>Response</p> <p>14.8 With effect from 1st July 2015 all schools are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.</p> <p>14.9 There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people. See Appendix 5</p> <p>14.10 Each academy in the Trust, is required to identify a Prevent Single Point of Contact</p>
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	<p>(SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the Designated Safeguarding Lead. The responsibilities of the SPOC are described in Appendix Five.</p> <p>14.11 Staff will be alert to changes in a child's behaviour or attitude which could indicate that they are in need of help or protection.</p> <p>14.12 When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead if this is not the same person.</p> <p>14.13 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.</p> <p style="text-align: center;">Channel</p> <p>14.14 Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to:</p> <ul style="list-style-type: none"> • Establish an effective multi-agency referral and intervention process to identify vulnerable individuals; • Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and • Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability. <p>14.15 The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.</p> <p>14.16 Schools have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).</p> <p>15 SAFEGUARDING PUPILS/STUDENTS WHO ARE VULNERABLE TO EXPLOITATION, FORCED MARRIAGE, FEMALE GENITAL MUTILATION, TRAFFICKING, CHILD SEXUAL EXPLOITATION, HONOUR BASED VIOLENCE, SEXTING or CHILDREN WHO GO MISSING FROM EDUCATION</p> <p>15.1 Our safeguarding policy above through the Trust's values, ethos and behaviour policies provides the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other.</p> <ul style="list-style-type: none"> • The Trust will keep up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation. • Our staff are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age appropriate way in their curriculum. • Our Trust works with and engages our families and communities to talk about such issues,
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- Our staff are supported to talk to families about sensitive concerns in Relation to their children and to find ways to address these concerns together wherever possible.
- Designated Safeguarding Leads knows where to seek and get advice as necessary.

15.2 Reporting of female genital mutilation (FGM)

- With effect from October 2015 all schools are subject to a mandatory reporting requirement in respect of female genital mutilation. When a teacher discovers that an act of FGM appears to have been carried out on a girl aged under 18, that teacher has a statutory duty to report it to the police. Failure to report such cases will result in disciplinary sanctions.
- When a teacher has reasons to suspect that an act of FGM has been carried out on a pupil or student, s/he will discuss the situation with the Designated Safeguarding Lead, who may consult children's social care before a decision is made as to whether the mandatory reporting duty applies.
- Signs and symptoms of FGM
 - A family arranging a long break abroad during the summer holidays.
 - Unexpected, repeated or prolonged absence from school.
 - Academic work suffering
- A girl or woman who's had female genital mutilation (FGM) may:
 - have difficulty walking, standing or sitting
 - spend longer in the bathroom or toilet
 - appear withdrawn, anxious or depressed
 - have unusual behaviour after an absence from school or college
 - be particularly reluctant to undergo normal medical examinations
 - ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A child may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

15.3 Child Sexual Exploitation

- Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
- Sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour.
- Young people who are being sexually exploited may:
 - go missing from home, care or education.
 - be involved in abusive relationships, feel intimidated and fearful of certain people or situations
 - hang out with groups of older people, or antisocial groups, or with other vulnerable peers
 - associate with other young people involved in sexual exploitation
 - get involved in gangs, gang fights, gang membership
 - have older boyfriends or girlfriends

- spend time at places of concern, such as hotels or known brothels
- not know where they are, because they have been moved around the country
- be involved in petty crime such as shoplifting
- have unexplained physical injuries
- have a changed physical appearance, for example lost weight.

15.4 Children who go missing from education

- A child going missing from education is a potential indicator of abuse or neglect, trafficking, sexual exploitation, FGM, forced marriage or travelling to conflict zones. School staff will be alert to these safeguarding concerns when a pupil or student goes missing for an extended period, or on repeat occasions.
- The school must notify the local authority of any pupil or student who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 days or more.
- The school must also notify the local authority of any pupil or student who is to be deleted from the admission register because s/he :
 - Has been taken out of school by their parents and is being educated outside the school system (e.g. home education);
 - Has ceased to attend school and no longer lives within a reasonable distance of the school at which s/he is registered;
 - Has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither s/he nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
 - Is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe that s/he will return to the school at the end of that period; or
 - Has been permanently excluded.

15.5 Honour based violence

Honour based violence and abuse can take many forms, e.g. threatening behaviour, assault, rape, kidnap, abduction, forced abortion, threats to kill and false imprisonment committed due to so called 'honour'. Murders in the name of 'so-called' honour, (often called Honour killings) are murders in which predominantly women are killed for actual or perceived immoral behaviour which is deemed to have brought shame on the family. Some examples nationally of honour based murders have been for trivial reasons for example, dressing or behaving too westernised, falling in love with somebody not chosen by their family, rejecting forced marriage or being LGBT.

15.6 Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages.

Sexting may also be called:

- trading nudes
- dirties
- pic for pic.

Sexting can be seen as harmless, but creating or sharing explicit images of a child

is illegal, even if the person doing it is a child. A young person is breaking the law if they:

- take an explicit photo or video of themselves or a friend
- share an explicit image or video of a child, even if it's shared between children of the same age
- possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

However, as of January 2016 in England and Wales, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest.

If a young person tells you they've been involved with sexting, it's important to remain calm and be understanding. You should report the concern immediately to the DSL and follow up in writing as directed by them.

16 WHAT WE DO WHEN WE ARE CONCERNED

16.1 Where risk factors are present but there is no evidence of a particular risk then our DSL /SPOC advises us on preventative work that can be done within academy to engage the pupil into mainstream activities and social groups. The DSL may well be the person who talks to and has conversations with the pupil or student's family, sharing the academy's concern about the young person's vulnerability and how the family and academy can work together to reduce the risk.

16.2 In this situation, depending on how worried we are and what we agree with the parent and the young person (as far as possible) –

- The DSL/SPOC can decide to notify the Multi-Agency Safeguarding Hub (MASH) of the decision so that a strategic overview can be maintained and any themes or common factors can be recognised; and
- The academy will review the situation after taking appropriate action to address the concerns.

16.3 The DSL/SPOC will also offer and seek advice about undertaking an early help assessment through 'Early Help' and/or making a referral to children's social care. The local family support and safeguarding hub can assist us.

16.4 If the concerns about the pupil or student are significant and meet the additional needs/complex need criteria, they will be referred to the MASH. This includes concerns about a pupil or student who is affected by the behaviour of a parent or other adult in their household,

17 CHILDREN IN SPECIFIC CIRCUMSTANCES

Private Fostering

17.1 Many people find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more it is private fostering.

17.2 The Children Act 1989 defines a relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step parent.

17.3 People become involved in private fostering for all kinds of reasons. Examples of

private fostering include :

- Children who need alternative care because of parental illness;
- Children whose parents cannot care for them because their work or study involves long or antisocial hours;
- Children sent from abroad to stay with another family, usually to improve their educational opportunities;
- Unaccompanied asylum seeking and refugee children;
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
- Children staying with families while attending a school away from their home area.

17.4 There is a mandatory duty on the carer, the parents, and anyone else involved in making the arrangement, to inform the local authority of a private fostering arrangement. The local authority has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

**For further information please click on the appropriate links below.
18 ADDITIONAL GUIDANCE TO SUPPORT CHILDREN IN SPECIFIC CIRCUMSTANCES:**

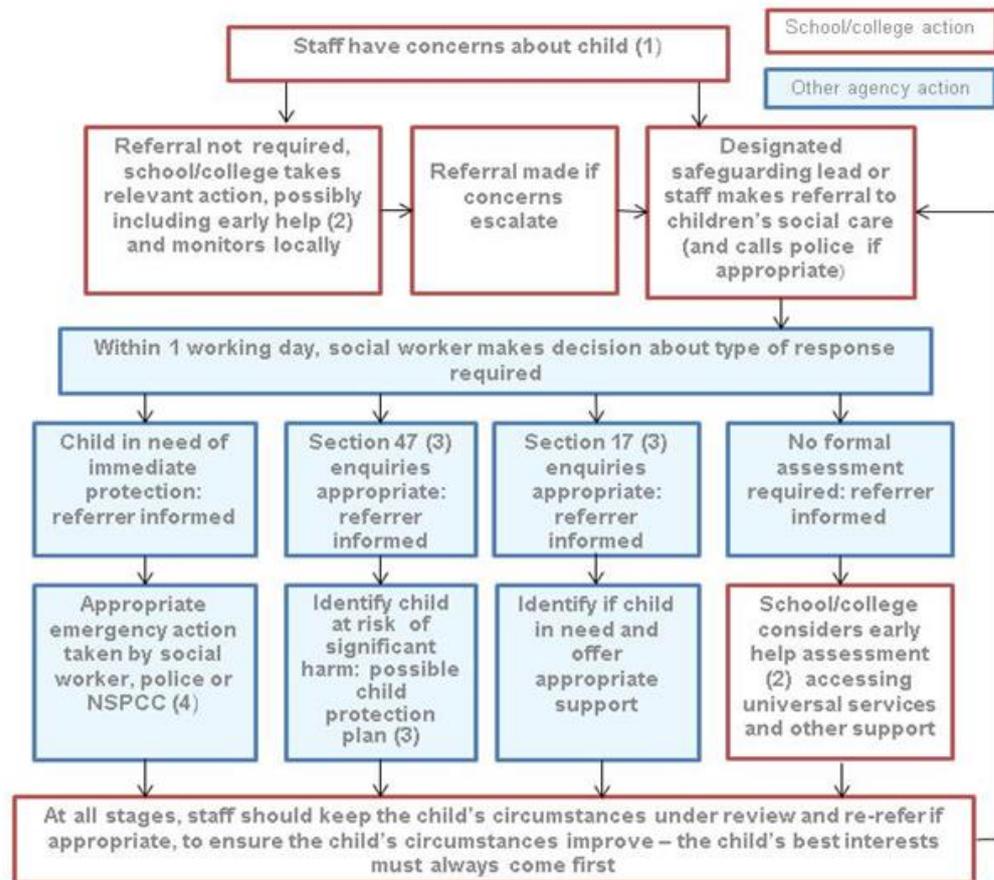
- [hate](#)
- [mental health](#)
- [missing children and adults strategy](#)
- [private fostering](#)
- [preventing radicalisation](#) – and Annex A
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)
- [bullying including cyberbullying](#)
- [children missing education](#) – and Annex A
- [child missing from home or care](#)
- [child sexual exploitation \(CSE\)](#) – and Annex A
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)

- [faith abuse and Honour Based Violence](#)
- [female genital mutilation \(FGM\)](#) – and Annex A
- [forced marriage-](#) and Annex A
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)

18. TRAINING:

All Designated Safeguarding leads keep a register of up to date training and copies of relevant certificates

Actions where there are concerns about a child



APPENDIX ONE

DEFINITIONS AND INDICATORS OF ABUSE

1. NEGLECT

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing 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);
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be exhaustive or intended to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is regularly not collected or received from school
- The child is left at home alone or with inappropriate carers.

2. PHYSICAL ABUSE

Physical abuse 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.

The following may be indicators of physical abuse (this is not designed to be exhaustive or intended to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, for example of a hand, a cord or an implement.
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

3. SEXUAL ABUSE

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

watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit act of sexual abuse as can other children

The following may be indicators of sexual abuse (this is not designed to be exhaustive or intended to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant
- Regressive behaviour, enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches in genital area

4. EMOTIONAL ABUSE

Emotional abuse is 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 children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child in participating in normal social interaction. It may also involve seeing 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.

The following may be indicators of emotional abuse (this is not designed to be exhaustive or intended to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

N.B.: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

5. RESPONSES FROM PARENTS

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home
- Violence between adults in the household

6. DISABLED CHILDREN

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification e.g. deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment e.g. callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances
- Inappropriate invasive procedures

APPENDIX TWO

DEALING WITH A DISCLOSURE OF ABUSE

- ADVICE TO STAFF

When a child tells me about abuse s/he has suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for

information.

- Listen and remember.
- Be sure that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

NB It is not our role to seek disclosures. Our role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to Children's Social Care without delay, by the Designated Safeguarding Leader.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Leader or Principal.

APPENDIX THREE

ALLEGATIONS AGAINST A CHILD OR OTHER LEARNER

1. Inappropriate behaviour by a child or other learner could take the following forms:

Physical

This includes, for example, intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.

Emotional

This includes, for example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes which discriminate on the grounds of race, gender, disability or sexuality.

Sexual

This includes, for example, sexualised behaviour towards another child, sexual harassment, sexting, use of social media, sexual assault and rape.

2. Allegations made by children against other learners will usually be covered under the Schools Behavior Policy. However, if a child makes an allegation against another learner, and the consequences of the actions raise credible child protection concerns the DSL should be notified and will record the incident and seek advice from **the Child Protection Manager for Schools and Education Services.**

3. The DSL must exercise, and be accountable for, professional judgement on the action to be taken as follows:

- If the actions of the child, and the consequences of the actions, raise credible child protection concerns the DSL will record the incident and seek advice from **the Child Protection Manager for Schools and Education Services.**

- If the actions of the child, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the child these should be addressed through the School's own internal procedures.
- If the DSL decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child protection file.

APPENDIX FOUR

ALLEGATIONS AGAINST A MEMBER OF STAFF, ACADEMY COUNCILLOR OR VOLUNTEER

1. Inappropriate behaviour by staff/volunteers could take the following forms:

Physical

This includes, for example, intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.

Emotional

This includes, for example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes which discriminate on the grounds of race, gender, disability or sexuality.

Sexual

This includes, for example, sexualised behaviour towards students, sexual harassment, sexual assault and rape.

Neglect

This includes, for example, failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment etc.

2. If a child makes an allegation against a member of staff, Academy Councillor, visitor or volunteer, the Principal should be informed immediately. The Principal should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Principal should not carry out the investigation him/herself or interview students.

3. The Principal must exercise, and be accountable for, professional judgement on the action to be taken, as follows -

- If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the Principal will notify **the Designated Officer in the Local Authority (Formerly know as the Local Authority Designated Officer – LADO) (Tel: 0121 675 1669)**. The **Designated Officer** will advise about action to be taken and may initiate internal referrals within Children's Social Care to address the needs of children likely to have been affected.
- If it is not clear whether the actions of the member of staff raise child protection concerns, the Principal must immediately seek advice from **the Child Protection Manager for Schools and Education Services**.
- If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the student(s), these should be addressed through the school's own internal procedures.
- If the Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child protection file.

4. Where an allegation has been made against the Principal, then the Chair of the Academy Council takes on the role of liaising with the **Local Authority Designated Officer** in determining the appropriate way forward.

Where an allegation is made against employees of the Trust Central Team the Chair of the board of Trustees takes on the role of liaising with the **Local Authority Designated Officer** in determining the appropriate way forward.

For further details of these specific procedures see the procedures of Birmingham Safeguarding Children Board.

APPENDIX FIVE

5. INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that academy staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
 - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

**PREVENTING VIOLENT EXTREMISM -
ROLES AND RESPONSIBILITIES OF THE SINGLE POINT OF CONTACT (SPOC)**

The SPOC is responsible for:

- Ensuring that staff of the Academy are aware that you are the SPOC in relation to protecting students/pupils from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students/pupils from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of the Ninestiles Trust in relation to protecting students/pupils from radicalisation and involvement in terrorism;
- Ensuring that our curriculum and assemblies are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the Trust about the safeguarding processes relating to protecting students/pupils from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the academy for case discussions relating to students / pupils who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information from in relation to referrals of vulnerable students / pupils into the Channel* process;
- attending Channel* meetings as necessary and carrying out any actions as agreed;

	<ul style="list-style-type: none"> • Reporting progress on actions to the Channel* Co-ordinator; and • Sharing any relevant additional information in a timely manner. <p>* Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to</p> <ul style="list-style-type: none"> • Establish an effective multi-agency referral and intervention process to identify vulnerable individuals; • Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and • Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
Monitoring and review	Trustees of The Academy Trust in consultation with Principals and Academy DSLs
Links	School Behaviour Policy Anti-bullying policy Exclusions policy Attendance policy Whistle Blowing Policy Staff Code of Conduct e-safety Policy British Values Statement No Platform Policy
Staff responsible	DSL Ben Lewis Deputy DSL Ann Heath
Committee responsible	Trustees of Ninestiles Academy Trust Lead Academy Councillor Vrigu Dey Principal James Power
Date approved	September 2017
Review date*	October 2018

**Please note that should any further national guidance be issued by external agencies that are relevant to this policy, it will be updated accordingly prior to the review date shown above.*