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# Child Protection & Safeguarding Policy

September 2023

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## 0. Document Control

The table below contains the changes made between the different final editions of this document set for approval. This is to help provide information to those reviewing and approving the document of the changes being made.

Document Edition	Section	Details of change
August 2022	All	Update to new brand
July 2022	All	Changed made in line with KCSIE September 2022
	4	Updated links to legislation and guidance documents
	5	Updated roles and responsibilities
	7	Updated pupil groups potentially at risk of harm
	14	Updated types of abuse and neglect Replaced peer-on-peer terminology with "child-on-child" abuse Updated online safety Updated CCE Updated CSE Updated consensual and non-consensual sharing of images
	31	Updated CP procedures and added "professional curiosity"
	38	Added Appendix 11 - Virginity Testing
June 2023	39	Updated radicalisation section
	1	Additional definitions
	4	Reordered relevant internal policies; updated legislation and statutory guidance
	5.2	Updated roles and responsibilities
	7	Updated pupil groups potentially at risk of harm
	13	Updated 'Children absent from education'
	14.2	Added teenage relationship abuse definition
	14.11	Updated Forced Marriage
	14.15	Updated child-on-child abuse section
	14.16	Added harmful sexual behaviour definition
	14.18	Updated Online Safety
	14.19	Added online abuse categories
	14.20	Updated use of school premises section
	17	Updated Allegations against Staff
	18	Additional section on Low Level concerns
	20	Updated training section
	23	Updated Safer recruitment
	33	Updated Appendix 5 'Signs of abuse in children'
	40	Updated definition of radicalisation
	41	Added Appendix 13 'Handling allegations of abuse against pupils'
42	Added Appendix 14 'Low-level concern reporting form'	

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## 1. Definitions

The "Trust" refers to the company known as the University Schools Trust, East London and all Trustees, Governors and Staff who work within it.

A "School" refers to an individual academy within the Trust, as denoted by their Unique Reference Number. As such a 'school' may span one or several phases of education to the individual academies within the Trust. Depending on the context the term "School" may refer to a singular academy or to all of the academies within the Trust but as separate entities.

"Staff" refers to any individual who is employed by the Trust or who operates on the Trust's behalf, e.g. Trustees and Governors, and those working in a voluntary capacity.

A "Parent" includes the natural or adoptive parent of a pupil as well as any non-parent / carer who has parental responsibility including being involved in the day to day care of a pupil.

A "Pupil" includes any incoming or current pupil at any School within the Trust who is 18 and under. It also includes any individual who was previously a pupil at any School within the Trust and who has left within the appropriate timeframe for consideration as necessary, e.g. complaints. The term pupil is used as standard by the UST in its policy documents but can be replaced with the term "student" or "child" with no change of definition.

"Child" and "Youth" includes everyone aged 18 and under.

The "Headteacher" is defined as the individual who has ultimate responsibility for a school in line with UST strategy, approach, ethos and values. Individual schools may have alternative titles for this position such as Executive Headteacher or Principal.

"Safeguarding" is defined as:

- protecting children from maltreatment;
- preventing 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.

"Child Protection" is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

"Abuse" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm

"Physical abuse" is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

"Emotional abuse" is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

"Sexual abuse" is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening.

"Neglect" is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development.

“Domestic abuse” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected.

“Child criminal exploitation” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity.

“County lines” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

“Child sexual exploitation” is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity.

“Modern slavery” encompasses human trafficking and slavery, servitude, and forced or compulsory labour.

“Forced marriage” is defined as a marriage that is entered into without the full and free consent of one or both parties.

“Female Genital Mutilation” or “FGM” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs.

“Child-on-Child” abuse is defined as abuse between children.

“Harmful sexual behaviour” is defined as any sexual behaviour which does not observe and respect any individuals on the receiving end of the behaviour.

“Online abuse” involves the use of technology and the internet in order to harass, threaten or intimidate another child. Instances of online abuse will be managed in line with this policy, the Online Safety Policy and the Anti-bullying Policy.

## 2. Scope of the Policy

This policy applies to all staff, parents and children as defined above.

## 3. Policy Aims and Ethos

Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and families has a role to play. In order to fulfil this responsibility effectively all staff should make sure their approach is child centred. This means that they should consider at all times, what is in the best interest of the child.

### 3.1. Aims

- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To support the child’s development in ways that will foster security, confidence and independence.
- To demonstrate the school’s commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To ensure that a zero tolerance approach to sexual violence and sexual harassment. Staff will note that it is never acceptable and will not be tolerated and will never be passed off as banter.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.

- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Multi Agency Safeguarding Hub (MASH).
- To ensure that all staff working within our schools who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check; and a single central record is kept for audit.
- To ensure staff understand and consider contextual safeguarding. This means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which such incidents and/or behaviours occur.

### 3.2. Principles

- The welfare of the child is paramount:
- All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical, mental wellbeing and moral development of the individual child.
- Pupils and staff involved in child protection issues will receive appropriate support and supervision.

### 3.3. Children should be supported:

- We recognise that a child who is abused or witness's violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- We recognise that school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn as well as exhibiting signs of mental health problems.
- We understand the impact on a child's mental health, behaviour and education when experiencing difficulties, abuse and/or neglect.

### 3.4. Our school will support all children by:

- encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying;
- promoting a caring, safe and positive environment within the schools;
- responding sympathetically to any requests for time out to deal with distress and anxiety;
- offering details of helplines, counselling or other avenues of external support, making referrals where appropriate;
- liaising and working together with all other settings, support services and those agencies involved in the safeguarding of children;
- ensuring the DSL supports staff to carry out their safeguarding duties;
- notifying MASH as soon as there is a significant concern;
- providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority;

- teaching children to understand and manage risk through our personal, social, health and economic (PSHE) education and Relationship and Sex Education and through all aspects of school life. This includes online safety; and
- by accessing and utilising the necessary resources, guidance and toolkits to support the identification of children requiring mental health support, support services and assessments and the subsequent systems and processes.

### 3.5. Prevention and Protection

- We recognise that school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.
- The school communities will therefore;
- work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to;
- include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes;
- ensure that all children know there are adults in the school whom they can approach if they are worried or in difficulty;
- include safeguarding across the curriculum, including PSE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help; in particular, this will include anti-bullying work, online-safety, road safety, pedestrian and cycle training; provide focussed activities to prepare key year groups for transition to new settings and/or key stages e.g. more personal safety/independent travel;
- ensuring the DSL supports staff to carry out their safeguarding duties; and
- ensure all staff, pupils and parents are aware of school guidance for their use of mobile technology and the safeguarding issues around the use of mobile technologies and their associated risks have been shared.
- all staff should be prepared to identify children who may benefit from early help

## 4. Links to Legislation and Guidance Documents

### 4.1. Relevant Internal Policies

This policy should be read in conjunction with the following documents:

- Additional Education and SEND Offer
- Allegations of abuse against staff policy
- Anti-Bullying Policy
- Attendance and Punctuality Policy
- Data Protection Policy
- Early Years Policy
- Educational Visits Policy and Procedures
- Health and Safety Policy
- Induction Policy
- Looked After Children Policy
- Mobile Devices and Remote Access Policy
- Online safety Policy
- Safer Recruitment Policy
- School Behaviour Policy
- Staff Code of Conduct
- Staff Handbook
- Statement for Visiting Speakers
- Use of the Internet Policy
- UST Funding Agreement

- UST Articles of Association
- Whistleblowing Policy

## 4.2. Relevant External Documents

### 4.2.1. Legislation:

- Human Rights Act 1998
- [The Children Act 1989](#) (and 2004 amendment)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and Childcare Act 2006
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

### 4.2.2. Statutory guidance

- DfE (2015) [Statutory Guidance on the Prevent Duty](#)
- Children Missing Education 2016
- DfE (2018/22) Working Together to Safeguard Children
- DfE (2018) ‘Disqualification under the Childcare Act 2006’
- Section 5B (11) of the Female Genital Mutilation Act 2003/2019
- DfE (2023) ‘Keeping children safe in education’
- [The Rehabilitation of Offenders Act 1974/2020](#)
- HM Government (2020) ‘Multi-agency statutory guidance on female genital mutilation’
- DfE (2021) ‘Teachers Standards’
- Statutory Framework for the Early Years Foundation Stage 2021
- HM Government (2021) ‘Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism’
- Home Office and Foreign, Commonwealth and Development Office (2023) ‘Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage’

### 4.2.3. Non-Statutory Guidance:

- DfE (2015) ‘What to do if you’re worried a child is being abused’
- DfE (2017) ‘Child sexual exploitation’
- DfE (2018) ‘Information sharing’
- DfE (2020) ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’
- National Police Chief’s Council (2020) ‘When to call the police: guidance for schools and colleges’
- DfE (2022) ‘Recruit teachers from overseas’
- Department of Health and Social Care (2022) ‘Virginity testing and hymenoplasty: multi-agency guidance’
- DfE (2022) ‘Working together to improve school attendance’

- DfE (2023) 'Meeting digital and technology standards in schools and colleges'

## 5. Roles and Responsibilities

### 5.1. Trust Board

- Ensure child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with statutory requirements, are reviewed annually and that the Safeguarding policy is publicly available on the UST website and by other means.
- Nominate a Trustee responsible for Safeguarding.

### 5.2. School Committee

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. NB: Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post.
- Ensure the DSL is given the additional time, funding, training, resources and support needed to carry out the role effectively.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place for children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.

- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly, in order to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust, whole-school approach to safeguarding.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to Child-on-Child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the virtual school head (VSH) to discuss how the pupil premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Put in place appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future and understand the reporting procedures for children missing education.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

- Ensure procedures are in place to deal with Sexual violence and sexual harassment between children in school.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

### 5.3. Trust Executive

- Ensure a member of the Trust Executive, usually the Trust Leader, is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headteacher.
- Ensure the Trust has procedures for dealing with allegations of abuse against staff (including the Headteacher), supply staff, volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- Ensure enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.
- Ensure the Safeguarding policy is publicly available on the school's website and by other means.

### 5.4. Headteacher

- Ensure the Safeguarding policy and procedures are implemented and followed by all staff;
- the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training within the last 2 years.
- Ensure a member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- Ensure sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy DSL(s) to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- sufficient time and resources are provided for necessary training to be undertaken and / or implemented by the DSL.
- Ensure pupils are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or for maintained schools through relationship and sex education (RSE).
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures;
- Ensure appropriate online filtering and monitoring systems are in place.
- Ensure they liaise with the Local Authority Designated Officer (LADO), before taking any action and on an ongoing basis, where an allegation is made against a member of staff, supply staff or volunteer; and anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.
- Ensure any weaknesses in Safeguarding are remedied immediately.
- Ensure the DSL is appropriately trained with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually;
- Ensure on appointment, the DSL and deputy(ies) undertake appropriate training offered by their school's local authority or other suitable provider annually.

### 5.5. Designated Safeguarding Lead

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Understands the views of young people, so that children feel heard and understood.

- Encourages a culture of listening.
- Understands the difficulties that children may have in approaching staff
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns. NB: Individual schools, working with the DSL, define what “available” means and whether, in exceptional circumstances, availability via phone, videocall, or other media is an acceptable substitution for in-person availability.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
  - To CSCS where abuse and neglect are suspected, and support staff who make referrals CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs’ Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officer(s) (LADO) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
  - Ensuring that the school knows which pupils have or had a social worker.
  - Understanding the academic progress and attainment of these pupils.
  - Maintaining a culture of high aspirations for these pupils.
  - Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
  - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a pupil’s child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school’s Child Protection and Safeguarding Policy and procedures - this will be discussed during the staff induction process.
- Work with the governing board to ensure the school’s Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.

- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least annually.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.
- The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

### 5.6. Deputy Designated Safeguarding Leads (DDSLs)

- Ensure they are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.
- Ensure they carry out or contribute to tasks as directed by the DSL, for example attending a core group meeting or completing a referral form.

### 5.7. Policy Compliance Lead

- Ensure the Safeguarding Policy complies with statutory guidance

### 5.8. Designated Policy Lead

- Ensure the Safeguarding policy is publicly available on the school's website and by other means.

### 5.9. HR Lead

- Ensure the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training within the last 2 years.
- Ensures that the single central register is kept up to date

### 5.10. All Staff

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.

- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the signs of abuse and understand that children can be at risk of harm inside and outside of the school, inside and outside the home, and online.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, including online safety training (which amongst other things includes an understanding of the expectations and responsibilities relating to filtering and monitoring) during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Understand and adhere to the procedure to follow in the event that a child confides they are being abused by a peer.
- Understand that children may not feel ready or know how to tell someone that they are being abused, and/or they may not recognise their experiences as harmful.
- Understand that technology is a significant component in many safeguarding issues.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours linked to issues such as drug-taking, alcohol misuse, deliberately missing education, and sharing indecent images, and other signs that pupils may be at risk of harm.
- Be aware of sexual violence and sexual harassment between children in schools and colleges guidance.
- Understand the importance of challenging inappropriate behaviours between children that are abusive in nature.
- Build trusted relationships with children and young people which facilitate communication.

### 5.11. Teachers

Teachers, including the headteacher, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

## 6. Children who are Particularly Vulnerable

We recognise that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- 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;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child;
- has an imprisoned parent;
- is experiencing mental health and wellbeing difficulties;
- is at risk of honour-based violence, such as, FGM;
- is at risk of sexual violence &/or sexual harassment;
- has a family member in prison;
- privately fostered; and / or
- persistently absent from school.

## 7. Pupil Groups Potentially at Greater Risk of Harm

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

### Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

### Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

### Looked After Children (LAC) and Previously Looked After Children (PLAC)

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

The designated teacher for looked after children works with the virtual school head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan. The designated teacher will follow the statutory guidance [Promoting the Education of Looked After Children](#).

Further details of safeguarding procedures for LAC and PLAC are outlined in the school's LAC Policy.

### Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

### LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

#### Pupils requiring mental health support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering, abuse, neglect or exploitation.

### 8. 'One Chance' Rule

All staff are aware of the 'One Chance' Rule particularly in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance to speak to a pupil who is a potential victim and have just one chance to save a life.

We are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

### 9. Pupil with Family Members in Prison

Pupils with a family member in prison will be offered pastoral support as necessary. They will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Parental consent must be sought before support is offered to the child.

### 10. Pupils Required to Give Evidence in Court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet '[Going to Court](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns (Primary School).

Pupils will be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns (Secondary School).

### 11. Mental Health

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Staff will not attempt to make a diagnosis of mental health problems - the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSL(s).

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies for routes to escalate if necessary.

## 12. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

We recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify MASH of the circumstances.

## 13. Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

The school will follow the DfE's guidance on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

### Admissions register

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contact details will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address
- If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:
  - The name of the new school
  - The date on which the pupil first attended, or is due to attend, that school

- Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.

Have ceased to attend the school, and no longer live within a reasonable distance of the premises.

Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.

Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.

Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

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### 14.1. Abuse and Neglect

For the purposes of this policy, “**abuse**” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, “**physical abuse**” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, “**emotional abuse**” is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-

treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently 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, but it may also occur alone.

For the purposes of this policy, “**sexual abuse**” is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, “**neglect**” is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure. All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

## 14.2. Domestic Abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, “domestic abuse” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected. “**Abusive behaviour**” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “**Personally connected**” includes people who:

- are, have been, or have agreed to be married to each other;
- are, have been, or have agreed to be in a civil partnership with each other;
- are, or have been, in an intimate personal relationship with each other;
- each have, or had, a parental relationship towards the same child; and/or
- are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Domestic abuse can occur within pupil’s own intimate relationships. This is known as teenage relationship abuse.

### 14.3. Homelessness

The DSL and deputy DSL(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

### 14.4. Anti-Bullying and Cyberbullying

Each school in our Trust has its policy on anti-bullying set out in a separate document and acknowledge that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which are shared with and analysed by each local governing body. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

### 14.5. Racist Incidents

Repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents and report them to the Local Authority. Racist incidents will usually be dealt with under our Behaviour Management Policy.

### 14.6. Radicalisation and Extremism

[The Prevent Duty](#) for England and Wales (2015) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children’s services to have due regard to the need to prevent people from being drawn into terrorism.

Prevent duty is part of schools wider safeguarding obligations.

Extremism is defined as ‘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.

Some children are at risk of being radicalised: this refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups (Terrorism Act 2020).

Definition of Terrorism - An action that endangers or causes serious violence to a person/people. Causes serious damage to property, seriously disrupts an electronic system or the use of threat must be designed to influence government or to intimidate the public and is made for the purpose of advancing political or religious or ideological cause.

We are clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

We seek 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.

School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 11.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice [Promoting Fundamental British Values](#) as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014).

The school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include, the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

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 DSL. They should then follow normal safeguarding procedures. If the matter is urgent then Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Prevent referrals may also be passed to multi agency "Channel Panel" which will discuss the individual referred to determine whether they are vulnerable to be being drawn into terrorism and consider the appropriate support required.

## 14.7. Child Criminal Exploitation (CCE)

KCSIE describes Child Criminal Exploitation as a form of abuse that occurs where an individual or group takes 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 or facilitator and/or through violence or the threat of violence. Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

For the purposes of this policy, “**child criminal exploitation**” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

In exchange for something the victim needs or wants

For the financial advantage or other advantage of the perpetrator or facilitator

Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

See Appendix 8 for indicators of CCE and County Lines.

## 14.8. County lines

For the purposes of this policy, “county lines” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

See Appendix 8 and 9 for indicators of CCE and County Lines.

## 14.9. Child Sexual Exploitation (CSE)

KCSIE 2022 describes Child Sexual Exploitation as a form of child sexual abuse. Sexual abuse 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 clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

KCSIE 2022 goes on to say that CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship, as a form of sexual abuse which involves the coercion, manipulation or deception of the victim by the perpetrator. The victim is coerced (etc) into sexual activity in order to obtain something that he or she wants or needs, and / or for the financial advantage or increased status of the perpetrator or facilitator, and / or through violence or the threat of violence. CSE can 'occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge (eg, through others sharing videos or images of them on social media)'. It can 'affect any child, including 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited (ie, they may believe they are in a genuine romantic relationship).'

For the purposes of this policy, "**child sexual exploitation**" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy. Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern

remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

See Appendix 7 and 9 for indicators of CSE.

### 14.10. Modern Slavery

For the purposes of this policy, “modern slavery” encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and with a referral to MASH who may refer them to the National Referral Mechanism.

### 14.11. Forced Marriage

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child’s eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extra-curricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage - the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing - this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment - in particular, the school's RSE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

## 14.12. Honour-Based Abuse (HBA)

Honour based violence (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. HBA is a form of abuse. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who;  
become involved with a boyfriend or girlfriend from a different culture or religion;  
want to get out of an arranged marriage;  
want to get out of a forced marriage;  
wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse.

### 14.13. Female Genital Mutilation

For the purposes of this policy, “**FGM**” is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school’s procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. NB: This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a ‘special procedure’ or a ceremony to ‘become a woman’.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of “**honour-based’ abuse (HBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child

is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

#### 14.14. Child Abduction and Community Safety Incidents

For the purposes of this policy, “**child abduction**” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

#### 14.15. Child-on-Child Abuse

For the purposes of this policy, “**Child-on-Child abuse**” is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including Child-on-Child abuse, as confirmed in the Child Protection and Safeguarding Policy.

All staff will be aware that Child-on-Child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of Child-on-Child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that Child-on-Child abuse is not occurring. All staff will speak to the DSL if they have any concerns about Child-on-Child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

The school will promote respectful interactions amongst pupils, and all staff will model appropriate and respectful behaviour. Staff will take care to avoid normalising harmful behaviour, particularly harmful sexual behaviour, e.g. by refraining from the use of phrases such as ‘boys will be boys’ or describing such behaviour as ‘just having a laugh’ or ‘part of growing up’, as these phrases can lead to a culture of unacceptable behaviours and normalised abuse.

The school will ensure that wider societal factors that exacerbate the problem of child-on-child abuse are reflected in its approach to creating a preventative culture. This means that individuals who are more likely to be abused, or who are at increased risk of acting as a perpetrator in abusive situations, are given additional support from an early stage. The school will have a clear set of values and standards that will be upheld and demonstrated throughout all aspects of school life and will be underpinned by the school’s policies, procedures and curriculum:

##### Girls

Staff will be aware that girls are more likely to be on the receiving end of child-on-child sexual abuse than their male counterparts, and that sexual violence and harassment against girls is very common and accounts for the majority of cases.

Taking into account that sexual harassment against girls is widespread in society, and largely based in gender inequality, the school will aim to encourage gender equality in all aspects of its operations. The school will aim to promote and nurture healthy attitudes and relationships amongst pupils of all genders, e.g. by challenging and working to deconstruct gender stereotypes in school.

Staff will challenge any incidents of misogynistic language or gender-based abuse, whether of a sexualised nature or not, as holding misogynistic viewpoints can make a pupil more likely to commit sexualised violence in the future.

### LGBTQ+ pupils

Staff will be aware that pupils who are LGBTQ+, or are perceived to be LGBTQ+ whether they are or not, are more likely to be targeted by their peers, e.g. for discriminatory bullying.

The school will hold a zero-tolerance policy towards pupils using homophobic, biphobic or transphobic language, regardless of whether or not the language is being directed at another individual. Every staff member will be individually responsible for challenging such behaviour and making clear to all pupils that any abuse towards pupils who are LGBTQ+, or who are perceived to be, is unacceptable. The school will ensure that it is able to provide a safe space for LGBTQ+ pupils to speak out and/or share their concerns with members of staff.

### Pupils with SEND

Staff will be aware that pupils with SEND are at increased risk of child-on-child abuse, as they are three times more likely to be abused than their peers. The school will ensure that there are mechanisms in place to support pupils with SEND in reporting abuse, with due regard that these pupils may face additional barriers to reporting abuse and that spotting signs of abuse in these pupils may be harder.

Staff will avoid assuming that changes in the behaviour of pupils with SEND are as a result of their needs or disability, and will report any concerns to the DSL. The DSL and the SENCO will collaborate in the handling of instances of abuse towards pupils with SEND to ensure that barriers to communication can be effectively managed.

### Black, Asian and minority ethnic (BAME) pupils

Staff will be aware that minority ethnic pupils, particularly black pupils, may be less likely to report abuse committed against them, and may be more likely to be misidentified as perpetrators of abuse.

The school will hold a zero-tolerance policy towards pupils using racist language, regardless of whether the language is being directed at another individual. Every staff member will be individually responsible for challenging such behaviour and making clear to all pupils that any abuse towards pupils from BAME backgrounds is unacceptable.

Staff will also be aware that BAME girls, BAME pupils with SEND, or BAME LGBTQ+, or perceived LGBTQ+ pupils, are likely to face increased abuse due to the intersection of these identities. Staff will be vigilant with regard to these pupils and the ways in which other pupils behave towards them, in order to ensure any incidents or potential incidents can be handled as soon as they occur.

The school will manage all early help and intervention for pupils that show early signs of harmful behaviour, or early signs of being the victim of harmful behaviour, in line with the Child Protection and Safeguarding Policy.

### Curriculum

The school maintains the position that education surrounding respectful and healthy attitudes and behaviour towards others is the best way to combat child-on-child abuse in the school. All staff, not just teaching staff, will be responsible for passing this knowledge on to pupils.

In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum and extra-curricular activities.

The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. The school will also teach a planned programme of evidence-based RSHE, delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such content will be fully inclusive, age and stage of development appropriate (especially when considering the needs of pupils with SEND), and tackle issues such as the following:

- Healthy and respectful relationships

- Boundaries and consent
- Stereotyping, prejudice and equality
- How to recognise an abusive relationship, including coercive and controlling behaviour
- LGBTQ+ identities and relationships
- Body confidence and self-esteem
- The concepts of, the laws relating to, and how to access support for the following:
  - Sexual consent
  - Sexual exploitation
  - Abuse
  - Grooming
  - Coercion
  - Harassment
  - Rape
  - Domestic abuse
  - So called honour-based violence, e.g. forced marriage or FGM
- What constitutes as sexual violence and sexual harassment and why these are always unacceptable

Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They will be taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

The curriculum will ensure that pupils of all ages are taught about and understand the concept of consent and its importance in an age-appropriate way.

Child-on-Child abuse can be manifested in many different ways, including but not limited to:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers - sometimes known as 'teenage relationship abuse'
- Physical abuse - this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence - this may include an online element which facilitates, threatens and/or encourages sexual violence, including:
  - Rape - intentional penetration of vagina, anus or mouth of another person.
  - Assault by penetration - intentional penetration of the vagina or anus with a part of her/his body or anything else.
  - Sexual assault - intentional sexual touching. Note assault covers a wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom, breast, genitalia without consent, can still constitute sexual assault.
  - Causing someone to engage in sexual activity without consent - intentionally causing another person to engage in an activity.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse. Sexual Harassment is unwanted sexual conduct of a sexual nature (online/offline, in and out of school). It is likely to violate a child's dignity, make them feel intimidated, degraded, humiliated or create a hostile, offensive or sexualised environment. This can include: sexual comments, Jokes, taunting, physical behaviour, online sexual harassment, consensual and non-consensual sharing of nude/semi-nude images, upskirting, sexualised online bullying, unwanted sexual comments, sexual exploitation.
- Initiation and hazing type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group, and may also include an online element.

All staff will be clear as to the school's policy and procedures regarding Child-on-Child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe.

The school's procedures for managing allegations of Child-on-Child abuse are outlined in this policy. Staff will follow these procedures, as well as the procedures outlined in their school's Anti-Bullying Policy and Exclusion Policy, where relevant.

### 14.16. Harmful Sexual Behaviour

Harmful sexual behaviour is defined as any sexual behaviour which:

Does not observe and respect any individuals on the receiving end of the behaviour, e.g. touching someone without their consent.

- Is inappropriate for the age or stage of development of the pupil.
- Is problematic, abusive or violent.
- May cause developmental damage.

Please note: Harmful sexual behaviour can occur online and/or face-to-face, and can also occur simultaneously between the two.

- This policy will use the following terms to describe pupils involved in child-on-child abuse:
- Victim(s) - the individual(s) against whom the abuse has, or has allegedly, been inflicted.
- Perpetrator(s) - the individual(s) exhibiting abusive behaviour against their peers.
- Alleged perpetrator(s) - individual(s) against whom a report of abusive behaviour has been made, where guilt has not yet been ascertained.

Please note: The use of the word 'alleged' does not mean that the pupil in question is not guilty of child-on-child abuse, that the school does not believe the allegation, or that the allegation will not be taken seriously. Staff will remember that the school has a legal duty of care to all perpetrators and alleged perpetrators who are pupils at the school, including a requirement to ensure they can access their education. Staff will also keep in mind that, in some cases, the abusive behaviour will have been harmful to the perpetrator as well. Victims will be reassured that use of the term 'alleged perpetrator' is not an attempt to discredit their allegation.

Staff will also be conscious of the fact that not everyone who has been subjected to abuse considers themselves a victim or would want to be described this way. Staff will be prepared to use any term which the individual child is most comfortable. Staff will think very carefully about terminology when speaking in front of pupils, and the use of appropriate terminology will be determined on a case-by-case basis.

### 14.17. Serious Violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.

- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

## 14.18. Online Safety and personal electronic devices

The school will always adhere to the Online Safety Policy.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Cyber-security Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the filtering and monitoring standards published by the DfE.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

### Online abuse

This involves the use of technology and the internet in order to harass, threaten or intimidate another child. Instances of online abuse will be managed in line with this policy, the Online Safety Policy and the Anti-bullying Policy.

Discriminatory behaviour encompasses abuse inflicted on a pupil because of their protected characteristics, e.g. religion, ethnicity, gender, sexual orientation, culture, or any SEND. Discriminatory behaviour is never acceptable, and all cases will be handled in line with this policy and the Child Protection and Safeguarding Policy.

In accordance with the Equality Act 2010, schools will not tolerate unlawful discrimination against pupils because of any protected characteristics they may have.

Intimate partner abuse involves a romantic partnership between children in which one or both partners are emotionally, physically or sexually abusive to the other (sometimes known as 'teenage relationship abuse'). This could include:

- Repetitive insults.
- Controlling behaviour, e.g. preventing a child from socialising with others or deliberately isolating them from sources of support.
- Sexual harassment.
- Threats of physical or sexual abuse.

The school will manage intimate partner abuse in the same way as a case of abuse between any other children, i.e. via the processes outlined in the Handling allegations of abuse against pupils section of this policy, and in line with the Child Protection and Safeguarding Policy.

### Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The school will also make it clear to parents what their children are being asked to do online for school.

### Reviewing online safety

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils.

### Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and / or
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

### Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "**Operating equipment**" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

## 14.19. Consensual and Non-consensual Sharing of Indecent Images

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible. Where a pupil confides in a staff member about the circulation of indecent imagery, depicting them or someone else, the staff member will:

- Refrain from viewing, copying, printing, sharing, storing or saving the imagery.
- Tell the DSL immediately if they accidentally view an indecent image and seek support.
- Explain to the pupil that the incident image will need to be reported.
- Respond positively to the pupil without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.
- Report the incident to the DSL.

The DSL will attempt to understand what the image contains **without viewing** it and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of pupils, including where there is an adult involved, where there is an intent to harm the pupil depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of pupils where there is no adult involvement or apparent intent to cause harm or embarrassment to the pupil.

For there to be a good and clear reason to view imagery, the DSL would need to be satisfied that this action is:

- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts, e.g. the contents of the imagery, from the pupil(s) involved.
- Necessary to report it to a website, app or suitable reporting agency to have the image taken down, or to support the pupil or their parent in making a report.
- Unavoidable because the pupil has presented the image directly to a staff member or the image has been found on a school device or your school's network.

Where it is necessary to view the imagery, e.g. if this is the only way to make a decision about whether to inform other agencies, the DSL should:

- Never copy, print, share, store or save them as this is illegal – if this has already happened, contact the local police for advice and to explain the circumstances.
- Discuss the decision with the headteacher or a member of the SLT.
- Make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the headteacher or a member of the SLT.
- Make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the SLT. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the school premises, ideally in the headteacher's office or a member of the SLT's office.
- Make sure, wherever possible, that they are viewed by a staff member of the same sex as the pupil in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions.

Where the incident is categorised as 'aggravated', the situation will be managed in line with the school's Child-on-Child Abuse Policy. Where the incident is categorised as 'experimental', the pupils involved are supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a pupil, the DSL escalates the incident to CSCS. Where indecent imagery of a pupil has been shared publicly, the

DSL will work with the pupil to report imagery to sites on which it has been shared and will reassure them of the support available.

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern, and follow reporting procedures to the DSL.

## 14.20. Use of the School Premises for Non-School Activities

Where the school committee or Trust hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe. The Trust will refer to the DfE's [guidance](#) on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

### Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

## 15. Alternative Provision

The school will remain responsible for a pupil's welfare during their time at an alternative provider. When placing a pupil with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

## 16. Work Experience

When a pupil is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

## 17. Allegations Against Staff

All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction.

We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member. Staff have a statutory duty to report concerns immediately. This includes low level concerns/Nagging doubts that staff may have. This includes where a staff member may have acted in a way that is inconsistent with the staff code of conduct. The school will ensure that staff are clear as to what appropriate behaviour is.

If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher.

The Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) at the earliest opportunity and before taking any further action.

If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Trust Leader who will consult the LADO as above, without notifying the Headteacher first.

The schools will follow the procedures set out in Keeping Children Safe in Education 2021 and each school's policy and procedures for managing allegations.

Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of the LADO and an HR Consultant in making this decision.

In the event of an allegation against the Headteacher, this should be reported to the Trust Leader, who will make any decision to suspend with advice as above. Where allegations are made against the Trust Leader, this should be reported to the Chair of the Trust who will make any decision to suspend as above.

We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

KCSIE is clear that the leadership team within each school have a duty of care to any staff members who face allegations. Leaders will identify support from within the school for any member of staff and signpost to the external occupational health provider.

Staff have a statutory duty to report concerns/nagging doubts that they may have. This includes where a staff member may have acted in a way that is inconsistent with the staff code of conduct. This is detailed in Section 18.

## 18. Low-level Safeguarding concerns

### 18.1. Definitions

For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below), or is otherwise not serious enough to consider a referral at the time of its reporting.

Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the 'Appropriate and inappropriate behaviour' subsection of this policy.

Low-level concerns are differentiated from concerns that can cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult 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 in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the school understands that many serious safeguarding concerns often begin with low-level concerns, e.g. being overly friendly with children. The school will ensure that all staff are aware of the importance of recognising concerns before they have an opportunity to escalate from low-level to serious.

## 18.2. Prevention amongst staff

### Appropriate and inappropriate behaviour

The school will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils.

Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority, and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers. Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the DSL, headteacher or other nominated person immediately.

Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to behaviour which is ultimately intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the DSL include, but are not limited to:

- Being overly friendly with children – this could include, but is not limited to, communicating with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.
- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.
- Taking photographs of children on their personal mobile phones or devices.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.

Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The headteacher will also evaluate whether additional

training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

### School culture

The school understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The school will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand, and adhere to the Appropriate and inappropriate behaviour subsection of this policy, as well as the Staff Code of Conduct and the Inappropriate Relationships with Pupils Policy.

Staff will address any questions they have regarding safeguarding to the DSL. The school will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff.

The school will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The school will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify inappropriate, concerning, or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils.

### Evaluating school culture following concerns

The school will ensure that appropriate consideration is given to the school's culture and whether or not it has enabled the inappropriate behaviour to occur. The headteacher will review whether any changes need to be made to relevant policies or training programmes in light of any evaluations of the school's culture, in order to achieve an open and transparent culture that deals with all concerns promptly and appropriately.

## 18.3. Reporting concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member.

Staff will report all safeguarding concerns they have to the DSL, or member of the Safeguarding team immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report concerns a specific incident, staff members will report their concerns no later than 24 hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

If the concern is a low-level concern staff members will report their concerns to the verbally and with a [Low-level Concern Reporting Form \(Appendix 5\)](#). When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and the Allegations of Abuse Against Staff Policy, and protect the identity of all individuals to which the concern pertains as far as possible.

Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the headteacher, it should be reported to the Trust Leader.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the headteacher, who will, in turn, inform the employer of the subject of the concern.

All concerns reported to the headteacher will be documented in line with the Records Management Policy.

## 18.4. Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct or violates the Inappropriate Relationships with Pupils Policy.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The headteacher and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

## 18.5. Evaluating concerns

Where the headteacher is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. When deciding if a concern is low-level, the headteacher will discuss the concern with the DSL and the deputy headteacher, and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the headteacher will ensure they adhere to the Data Protection Policy, and the information sharing principles outlined in the Child Protection and Safeguarding Policy, at all times.

To evaluate a concern, the headteacher and DSL will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation and dealt with alongside the Allegations of Abuse Against Staff Policy.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

## 18.6. Acting on concerns

### Where the concern is unfounded

If it is discovered upon evaluation that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct, the Inappropriate Relationships with Pupils Policy and the law, the headteacher will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such

misunderstandings in the future. The headteacher will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The headteacher will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

The headteacher will discuss the concern with the DSL (and if they have been involved, the LADO) to discern whether the behaviour, and the reporting of this behaviour, is indicative of ambiguity in the school's policies or procedures, or the training it offers to staff. Where such ambiguity is found, the DSL and headteacher will work together to resolve this with input from other staff members, as necessary.

### Where the concern is low-level

Where the headteacher determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The following procedure will be followed:

- The DSL holds a meeting with the individual about whom the concern was reported, during which they will:
  - Talk to the individual in a non-accusatory and sympathetic manner.
  - Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
  - Clearly state what about their behaviour was inappropriate and problematic.
  - Discuss the reasons for the behaviour with the individual.
  - Inform the individual clearly what about their behaviour needs to change.
  - Discuss any support that the individual may require in order to achieve the proper standards of behaviour.
  - Allow the individual the opportunity to respond to the concern in their own words.
- The DSL asks the individual to re-read the Staff Code of Conduct and/or the Inappropriate Relationships with Pupils Policy, depending on the nature of the concern.
- The DSL and the headteacher will consider whether the individual should receive guidance, supervision or any further training.
- Where considered appropriate in the circumstances, the headteacher will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.
- Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.
- Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate.

The headteacher will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line with the Records Management Policy and the Data Protection Policy. The headteacher will ensure that these records are kept organised and up-to-date, and that it is easy to refer back to them if any other concerns are reported about the same individual.

The specific approach to handling low-level concerns will be adapted on a case-by-case basis. It is unlikely that a low-level concern will result in disciplinary procedures; however, individuals may be given warnings in line with the Disciplinary Policy and Procedure where behaviour does not improve once it is brought to their attention. Where behaviour does not improve over a longer period of time, the concerns will be escalated and dealt with in line with the Allegations of Abuse Against Staff Policy.

### Where the concern is serious

The headteacher may decide upon evaluation that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The headteacher will then follow the procedures laid out in the Allegations of Abuse Against Staff Policy.

## 18.7. Record keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded. The headteacher will ensure that all records include the most accurate and up-to-date information and will store them electronically in a low-level concerns tracker. The headteacher will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary.

Records will include:

- A clear and comprehensive summary of the concern.
- The context in which the concern arose.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached, and the outcome.
- The name of the individual sharing concerns - if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews.

Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the headteacher to decide on a course of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable. It should be considered whether there are any wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies, including this one, could be revised, or extra training provided to staff to decrease the risk of it happening again.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there has been a concerning pattern of behaviour which has resulted in action. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation.

The DSL will ensure that all records are kept in a manner that is consistent with the Data Protection Policy. Records will be confidential, kept password-protected, and securely destroyed in line with retention and destruction requirements

When providing employment references, the school will ensure that any information provided confirms whether they are satisfied with the applicant's suitability to work with children, and only provide the facts of any substantiated safeguarding concerns or allegations, including a group of low-level concerns about the same individual, that meet the harm threshold.

Any repeated low-level safeguarding concerns or allegations which do not meet the harm threshold which have been found to be false, unfounded, unsubstantiated, or malicious will not be included in any reference.

The headteacher will decide in exceptional circumstances if a reference cannot be provided or if certain questions asked by the prospective employer cannot be answered, with HR advice sought when appropriate.

## 19. Confidentiality, Information Sharing and GDPR

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

School staff should be proactive in sharing as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

Staff should only discuss concerns with the DSL, Headteacher, Trust Leader or Chair of Trust (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, Keeping Children Safe in Education (2022) emphasises that any member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with the Data Protection Act 2018 and HM Government Information Sharing and Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018. Schools in the Trust use CPOMS to record and save Child Protection and Safeguarding concerns, including communications to and from external partners who have a child protection/safeguarding function.

Information sharing is guided by the following principles:

- necessary and proportionate;
- relevant;
- adequate;
- accurate;
- timely;
- secure.

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children;

- safety of the child is always paramount.
- Our schools recognise that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm the school must contribute to inter-agency working in line with Working Together to Safeguard Children (2018) and share information between professionals and agencies where there are concerns.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 is not a barrier to sharing information where the failure to do so would place a child at risk of harm.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- Staff will receive regular updates and DSL will cascade awareness around for example, FGM, Sexual violence and sexual harassment
- However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Headteacher or DSLs will only disclose information about a child to other members of staff on a need to know basis.
- We will always undertake to share our intention to refer a child to MASH with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will contact the MASH consultation line.

## 20. Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a termly basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy
- The Behavioural Policy
- Low-level safeguarding concerns
- The Child-on-Child Abuse procedures
- The Staff Code of Conduct
- Whistleblowing policy
- Allegations of abuse against staff policy
- 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate)
- The Children Missing Education Policy, including the safeguarding response to children who go missing from education
- Appropriate child protection and safeguarding training, including online safety training- which amongst other things, includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Information about the role and identity of the DSL and deputy DSL(s)

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

In addition to the above, all staff should be aware of the following:

- Local early help process and their role in it, including being particularly alert to the potential need for early help for certain pupils, e.g. those who have SEND or are young carers, and being prepared to identify those who may benefit from early help
- The process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm), that may follow a referral, and the role they may be expected to play in such assessments
- What to do if a pupil says they, or another child, are being abused, exploited or neglected, and how to maintain an appropriate level of confidentiality by only involving those who need to be involved, e.g. the DSL and children's social care
- The processes and procedures to follow if they have a safeguarding concern about another staff member
- How to respond to pupils following a disclosure, e.g. reassuring them that they are being taken seriously and they will be supported and kept safe, and not making them feel ashamed or that they are causing a problem by making a report
- The need to always speak to the DSL or a deputy about a possible safeguarding issue, including if they are unsure, e.g. if a pupil may be in need of help or protection, and to not assume a colleague will take action and share information
- The need to maintain a professional curiosity given that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, or may not recognise their experiences as harmful.
- The need to always act in the best interests of a pupil where there are any concerns about their welfare

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSL(s) will undergo child protection and safeguarding training and update this training at least every two years. The DSL and deputy DSL(s) will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up to date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

The minimum training offer for all staff will be as follows:

<b>Participants in Training</b>	<b>Type of Training</b>	<b>Timing / Frequency</b>	<b>Training Provider</b>
All staff	Safeguarding Induction	On joining	DSL or DDSL
All staff	Annual update	Annually (usually September)	DSL or DDSL
All staff	Reading time for KCSIE		
Annually in September	DSL or DDSL		
All visiting staff	Reading time for school specific safeguarding information	On arrival	DSL or DDSL
Governors	Annual update	Annually (usually Autumn Term)	DSL or External Provider

## 21. Use of Reasonable Force

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, damaging property or causing disorder. At all times it must be the minimal force necessary to prevent injury to another person and reasonable and proportionate to the risk that is prevented.

Such events should be recorded, and witness statements should be gathered, if available.

Staff who are likely to need to use physical intervention will be appropriately trained, but this does not prevent other staff from making an intervention if it is deemed necessary.

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

Further guidance can be found in [Use of reasonable force: Advice for headteachers, staff and governing bodies](#).

## 22. Mobile Phones and Cameras

Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

We request that photographs taken at events and performances should not be shared publicly (e.g., on social media) without appropriate permissions.

## 23. Safer Recruitment

The school's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The Trust will conduct the appropriate pre-employment checks, including online checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

### Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the [declaration form](#) confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

### Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

### Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

## 24. Single Central Record

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

All members of the proprietor body are also recorded on the SCR.

The MAT holds a central SCR containing information that is easily accessible and recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to all who need to see it, including Ofsted.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

## 25. Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.

The school will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

### Information sharing

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL(s).

## 26. Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any pupil may benefit from early help, but staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

## 27. Transparency for Parents

KCSIE continues to highlight the school's role in protecting children from abuse. Tower Hamlets Local Authority suggests that schools include the following statement for parents/carers, and we believe it is of relevance to all our schools.

'All schools have a clear responsibility placed on them by the Children Act 1989 and by guidance from the Department for Education to safeguard the welfare of all their pupils. In doing so, schools are expected to consult with Children's Social Care if they believe there is a possibility that a child may be suffering from

abuse or neglect. A referral to Children’s Social Care is not intended to be an accusation of any particular action or against any person. It is the reporting of concerns which have come to the school’s attention. This is in accordance with Tower Hamlets Local Safeguarding Children Board’s Child Protection Procedures.’

UST has a Safeguarding Policy which covers all its schools, and this refers to Local Safeguarding Children Board’s Child Protection Procedures. School and Local Authority documents are publicly available and can be consulted by parents/carers. Any one of the Designated Safeguarding Officers will be happy to discuss any questions or concerns parents/carers may have about Child Protection practice.

## 28. Whistleblowing

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

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school’s safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the UST Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Whistleblowing re. the Headteacher should be made to Trust Leader whose contact details are readily available to staff (as pertinent to setting).

## 29. Complaints and Concerns about School Safeguarding

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see section 26). Other complaints relating to safeguarding would be addressed under our normal complaints procedure - see the school Complaints Policy.

## 30. Appendix 1 - Key Members of Staff Referenced

 <b>Cyril Jackson Primary School - Key Contacts</b>	
Designated Safeguarding Lead	Hodo Dirir <a href="mailto:h.dirir@cyriljackson.towerhamlets.sch.uk">h.dirir@cyriljackson.towerhamlets.sch.uk</a>
Deputy Designated Safeguarding Leads	Catherine Beckford (sabbatical, 09/22 onwards) <a href="mailto:c.beckford@cyriljackson.towerhamlets.sch.uk">c.beckford@cyriljackson.towerhamlets.sch.uk</a>
	Rukeya Begum <a href="mailto:rukeya.begum@cyriljackson.towerhamlets.sch.uk">rukeya.begum@cyriljackson.towerhamlets.sch.uk</a>
	Sophia Dover <a href="mailto:s.groome@cyriljackson.towerhamlets.sch.uk">s.groome@cyriljackson.towerhamlets.sch.uk</a>
	Jesslyn Holman <a href="mailto:jesslyn.holman@cyriljackson.towerhamlets.sch.uk">jesslyn.holman@cyriljackson.towerhamlets.sch.uk</a>
	Aysha Islam <a href="mailto:a.islam@cyriljackson.towerhamlets.sch.uk">a.islam@cyriljackson.towerhamlets.sch.uk</a>
	Lipi Islam <a href="mailto:lipi.islam@cyriljackson.towerhamlets.sch.uk">lipi.islam@cyriljackson.towerhamlets.sch.uk</a>
	Alysha Kassam <a href="mailto:a.kassam@cyriljackson.towerhamlets.sch.uk">a.kassam@cyriljackson.towerhamlets.sch.uk</a>
	Maryum Qureshi <a href="mailto:m.qureshi@cyriljackson.towerhamlets.sch.uk">m.qureshi@cyriljackson.towerhamlets.sch.uk</a>
	Mark Ripper <a href="mailto:m.ripper@cyriljackson.towerhamlets.sch.uk">m.ripper@cyriljackson.towerhamlets.sch.uk</a>
Teacher for Looked After Children	Hodo Dirir <a href="mailto:h.dirir@cyriljackson.towerhamlets.sch.uk">h.dirir@cyriljackson.towerhamlets.sch.uk</a>
Headteacher	Hodo Dirir <a href="mailto:h.dirir@cyriljackson.towerhamlets.sch.uk">h.dirir@cyriljackson.towerhamlets.sch.uk</a>
Chair of Governors	Sue Stollery <a href="mailto:sstollery@ust.london">sstollery@ust.london</a>
Safeguarding Governor	Sue Stollery <a href="mailto:sstollery@ust.london">sstollery@ust.london</a>

 <b>Royal Greenwich Trust School - Key Contacts</b>	
Designated Safeguarding Lead	Olivia Saunders (KS3) <a href="mailto:Saunders.o@rgtrustschool.net">Saunders.o@rgtrustschool.net</a>
Deputy Designated Safeguarding Leads	Lee Davey <a href="mailto:Davey.l@rgtrustschool.net">Davey.l@rgtrustschool.net</a>
	Michael Toye (KS4) <a href="mailto:Toye.m@rgtrustschool.net">Toye.m@rgtrustschool.net</a>
Teacher for Looked After Children	Pamela Adodo <a href="mailto:Adodo.P@rgtrustschool.net">Adodo.P@rgtrustschool.net</a>
Headteacher	Caroline Toye <a href="mailto:Toye.C@rgtrustschool.net">Toye.C@rgtrustschool.net</a>
Chair of Governors	Hilary Orpin <a href="mailto:horpin@ust.london">horpin@ust.london</a>
Safeguarding Governor	Hilary Orpin <a href="mailto:horpin@ust.london">horpin@ust.london</a>

 <b>St Paul's Way Primary School - Key Contacts</b>	
Designated Safeguarding Lead	David Ash <a href="mailto:Davidash@spwt.net">Davidash@spwt.net</a>
Deputy Designated Safeguarding Leads	Siobhan Fehim <a href="mailto:siobhanfehim@spwt.net">siobhanfehim@spwt.net</a>
Teacher for Looked After Children	David Ash <a href="mailto:Davidash@spwt.net">Davidash@spwt.net</a>
Headteacher	Siobhan Fehim <a href="mailto:Siobhanfehim@spwt.net">Siobhanfehim@spwt.net</a>
Executive Headteacher	Nicholas John <a href="mailto:njohn@spwt.net">njohn@spwt.net</a>
Chair of Governors	Joe Hall <a href="mailto:coflaherty@spwt.net">coflaherty@spwt.net</a>
Safeguarding Governor	Sarah Webster <a href="mailto:coflaherty@spwt.net">coflaherty@spwt.net</a>

 <p><b>St Paul's Way</b> Aspiration • Integrity • Community PART OF UNIVERSITY SCHOOLS TRUST</p>		<p><b>St Paul's Way Trust School - Key Contacts</b></p>
Designated Safeguarding Lead		Owen Williams <a href="mailto:owilliams@spwt.net">owilliams@spwt.net</a>
Deputy Designated Safeguarding Leads		Firdusi Uddin <a href="mailto:fuddin@spwt.net">fuddin@spwt.net</a>
		Gloria Lynch <a href="mailto:glynch@spwt.net">glynch@spwt.net</a>
		Dionne Mottley <a href="mailto:dmottley@spwt.net">dmottley@spwt.net</a>
Teacher for Looked After Children		Emma McCay <a href="mailto:EMccay@spwt.net">EMccay@spwt.net</a>
Head of school		Firdusi Uddin <a href="mailto:fuddin@spwt.net">fuddin@spwt.net</a>
Executive Headteacher		Nicholas John <a href="mailto:njohn@spwt.net">njohn@spwt.net</a>
Chair of Governors		Joe Hall <a href="mailto:coflaherty@spwt.net">coflaherty@spwt.net</a>
Safeguarding Governor		Sarah Webster <a href="mailto:coflaherty@spwt.net">coflaherty@spwt.net</a>

## 31. Appendix 2 - Local Authority Contacts

<b>London Borough of Tower Hamlets</b>	
MASH	020 7364 3444 / 5606 / 5601 (Mon-Fri, 9am-5pm) <a href="mailto:MASH@towerhamlets.gov.uk">MASH@towerhamlets.gov.uk</a> <a href="mailto:MASH@towerhamlets.gov.uk">mailto:</a>
MASH Out of Hours	020 7364 4079
Early Help Hub	020 7364 5006
LADO	0207 364 0677 07903 238827 <a href="mailto:LADO@towerhamlets.gov.uk">LADO@towerhamlets.gov.uk</a>

<b>Royal Borough of Greenwich</b>	
MASH	Monday - Thursday 9:00am - 5:30pm / Friday 9:00am - 4:30pm Professionals' consultation line - 020 8921 2267 Referrals - 020 8921 3172 <a href="mailto:MASH-referrals@royalgreenwich.gov.uk">MASH-referrals@royalgreenwich.gov.uk</a>
MASH Out of Hours	020 8854 8888
Early Help Hub	020 8921 3172 (Same email address as above)
LADO	020 8921 3930 <a href="mailto:childrens-LADO@royalgreenwich.gov.uk">childrens-LADO@royalgreenwich.gov.uk</a>

### Appendix 3 – Links to Legislation and Guidance Documents

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/665520/Teachers\\_Standards.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/665520/Teachers_Standards.pdf) Teachers Standards 2021
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education 2023](#)
- [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018](#)
- [What to do if you're worried a child is being abused 2015](#)
- [The Prevent Duty](#)
- [Promoting Fundamental British Values](#)
- [FGM procedural information](#)
- [Promoting the Education of Looked After Children](#)
- [Children Missing Education: Statutory Guidance for Local Authorities.](#)
- [Preventing Youth Violence and Gang Involvement.](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- [Use of reasonable force: Advice for headteachers, staff and governing bodies.](#)
- [Working Together to Safeguard Children 2022](#)
- [Education \(Independent School Standards\) Regulations 2014](#)
- [Non-Maintained Special Schools \(England\) Regulations 2015](#)
- [The Children Act 1989 \(and 2004 amendment\)](#)
- [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018](#)
- [What to do if you're worried a child is being abused 2015](#)
- [Serious Crime Act 2015](#)
- [The Rehabilitation of Offenders Act 1974](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Statutory Guidance on the Prevent Duty](#)
- [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#)
- [the Statutory Framework for the Early Years Foundation Stage 2021](#)
- DfE (2022) 'Recruit teachers from overseas'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'

### Additional Guidance Sources

- NSPCC: <http://www.nspcc.org.uk/>
- Childline: <http://www.childline.org.uk/pages/home.aspx>
- Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>
- Beat Bullying: <http://www.beatbullying.org/>
- Childnet International – making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>
- Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>
- Safer Internet Centre <http://www.saferinternet.org.uk/>
- Transgender <http://www.mermaidsuk.org.uk/>

## 32. Appendix 4 – Child Protection Procedures

### 32.1. If staff are concerned about a child's welfare

If staff notice any indicators of abuse/neglect or signs that a child may be experiencing a safeguarding issue they should record these concerns on CPOMS. They should verbally (either in person or over the telephone) alert the DSL or the DDSL to their concern. Recording the concern and alerting the DSL should be treated as an urgent priority. They may also discuss their concerns in more detail in person with the DSL, but the details of the concern should be recorded on CPOMS. Staff should not assume the DSL has read CPOMS.

There will be occasions when staff may suspect that a pupil may be at risk but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed, these concerns should be discussed with the DSL and recorded on CPOMS.

We recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding.

In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL and record them on CPOMS.

If the pupil does begin to reveal that they are being harmed, staff should follow the advice below regarding a pupil making a disclosure.

Staff will be aware that pupils 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. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

### 32.2. If a pupil discloses to a member of staff

We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.

A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

During their conversation with the pupil staff will:

- Listen to what is being said without showing shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child but not make promises which it might not be possible to keep
- Not promise confidentiality – the requirement to act in the child's best interests means that it might be necessary to refer the matter to other services
- Stress that it was the right thing to tell
- Listen, rather than ask direct questions
- Ask open questions rather than leading questions
- Not criticise an alleged perpetrator
- Explain what has to be done next and who has to be told in an age appropriate way.

### 32.3. Record Keeping

When a pupil has made a disclosure the member of staff should

- Make brief notes as soon as possible after the conversation verbatim 'in child's own words'
- Not destroy the original notes in case they are needed by a court
- Use a body map to indicate the position of any bruising or other injury, do not ask the child to undress
- Record statements and observations rather than interpretations or assumptions
- Any paper records should be scanned in and saved onto CPOMS.

If a pupil talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on - staff are not allowed to keep secrets.

The member of staff should write up their conversation as soon as possible on CPOMS using the child's own words. Staff should make this a matter of priority. They should also detail:

- the date, time, place and any noticeable non-verbal behaviour and the words used
- where the disclosure was made and who else was present
- Use a body map to indicate the position of any bruising or other injury
- Record statements and observations rather than interpretations or assumptions

Any paper records should be scanned in and saved onto CPOMS.

The DSL (or DDSL) should be verbally alerted to the disclosure (in person or over the phone).

### 32.4. Notifying Parents

The School will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and normally the DSL/DDSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's MASH e.g., familial sexual abuse.

Where there are concerns about forced marriage or honour-based abuse parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk. In some circumstances it would be appropriate to contact the police.

### 32.5. Making a referral

Concerns about a child or a disclosure should be immediately raised with the DSL who will help decide whether a referral to children's MASH or other support is appropriate in accordance with Threshold guidance from their Local Authority.

If a referral is needed, then the DSL should make this rapidly and systems must be in place to enable this to happen. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves.

The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.

If a child is in immediate danger or is at risk of harm a referral should be made to children's MASH and/or the police immediately. Anybody can make a referral.

Where referrals are made by someone other than the DSL, the DSL should be informed as soon as possible.

### 32.6. Supporting our Staff

We recognise that staff working in the school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

## 33. Appendix 5 – Recognising Signs of Child Abuse

### 33.1. Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

### 33.2. Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- |   |  |
|---|--|
| • Significant change in behaviour                     | • Child Sexual Exploitation  |
| • Extreme anger or sadness                            | • Criminality  |
| • Aggressive and attention-needing behaviour          | • Substance abuse  |
| • Suspicious bruises with unsatisfactory explanations | • Mental health problems   |
| • Lack of self-esteem                                 | • Poor attendance/deliberately missing education                               |
| • Self-injury   | • Serious violence   |
| • Depression and/or anxiousness                       | • Consensual and non-consensual sharing of nude and semi-nude images or videos |
| • Age-inappropriate sexual behaviour                  |  |

### 33.3. Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague).
- May require consultation with and / or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred. In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

### 33.4. Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury

- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

#### 33.4.1. Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g., belt marks, handprints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

#### 33.4.2. Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

#### 33.4.3. Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation
- Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

#### 33.4.4. Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

The history provided is vague, non-existent or inconsistent with the fracture type

There are associated old fractures

Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement

There is an unexplained fracture in the first year of life

#### 33.4.5. Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

### 33.5. Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g., anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a "loner" - difficulty relating to others

#### 33.5.1. Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

#### 33.5.2. Behavioural indicators associated with Sexual Abuse

Some physical indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g., for sports events (but this may be related to cultural norms or physical difficulties)

#### 33.5.3. Physical Indicators Associated with Sexual Abuse

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

### 33.6. Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

## 34. Appendix 6 - Sexual Abuse and Sexual Harassment

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children. Staff should be vigilant to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- upskirting

### 34.1. Inappropriate Sexual Behaviour

Can be inappropriate socially, in appropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

### 34.2. Abusive sexual activity

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- Equality - consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent - agreement including all the following:
  - Understanding that is proposed based on age, maturity, development level, functioning and experience
  - Knowledge of society's standards for what is being proposed
  - Awareness of potential consequences and alternatives
  - Assumption that agreements or disagreements will be respected equally
  - Voluntary decision
  - Mental competence
- Coercion - the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

### 35. Appendix 7 - Indicators of CSE, CCE and County Lines

This is not an exhaustive list of the indicators of Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) or County Lines. Practitioners should be aware that many of the indicators might be common to more than one form of exploitation. This is because the driving forces behind different forms of exploitation are often similar, and the same grooming models used to coerce, intimidate and abuse children for sexual and criminal exploitation, for example, are also liable to be used to groom individuals for County Lines.

Underage sexual activity	Inappropriate sexual or sexualised behaviour	Sexually risky behaviour / 'swapping' sex	Regular school absence / truanting	Receiving unexplained gifts or gifts from unknown sources	Involvement in crime, police involvement
Having older boyfriends or girlfriends	Child Sexual Exploitation	Repeated sexually transmitted infections	Gangs, gang membership	Child Criminal Exploitation	Having unaffordable new things or expensive habits
Changes in the way they dress	Youth-produced sexual imagery (etc)	In girls, repeated pregnancy, abortions, miscarriage	Hanging out with groups of older people, anti-social groups or other vulnerable peers	Involved in abusive relationships, intimidated and fearful	Drug or alcohol misuse

Exploitation

Going missing from home or school	Going to hotels or other unusual locations to meet friends	Seen at known places of concern
Recruiting other people to exploitative situations	County Lines	Moving around the country, appearing in new places, not knowing where they are
Getting in / out of cars driven by unknown adults	Having multiple mobile phones and worrying about losing contact	Contact with known perpetrators

## 36. Appendix 8 - CCE Risk Assessment and Management Tool

Subject name:

Date of referral:

Total risk score:

<b>EXPLOITATION RISK CATEGORIES</b>		
1. Running Away / Going Missing	EMERGING	Regularly coming home late / Absent without permission / Returning late to care home / Absent from school / Whereabouts often unknown
	MODERATE	Frequently staying out overnight without permission / Episodes of running away, missing from home or placement / Looking well cared for despite having no known base / Regular breakdowns of placement due to behavioural problems / Taken to parties, houses, unknown areas, hotels, nightclubs, takeaways or out of area by unknown adults / Returns from missing episodes with injuries or dishevelled appearance / Extended periods of being missing from home or placement
	SIGNIFICANT	Persistently running away, going missing from home or placement / Pattern of street homelessness / Whereabouts often unknown or of significant concern, talks about and/or known to travel to different areas or cities, persistently found outside of area where they reside / Returns from missing episodes with injuries (suggestive of physical assault) or dishevelled appearance
2. Coercion / Control	EMERGING	Change in behaviour / Recent change in peer group / Not mixing with usual friends / Reduced contact with family
	MODERATE	In possession of multiple handsets / Limited contact with family/friends / Possession of hotel keys/cards or key to unknown locations
	SIGNIFICANT	In possession of multiple handsets / Receives an excessive number of text messages or phone calls / Possesses multiple sim cards / sim card packaging / Possess 'burner' type handsets / Disclosure of or police intelligence regard physical assault followed by withdrawn allegation/reluctant to report / No contact with family/friends / Disappears from system (no contact with support systems) / Disclosure of or police intelligence relating to county lines/gang activity involvement or links / Talks about having drug debts and an urgent need for money / Family report hostile acquaintances coming to the door or telephoning/messaging and making threats.
3. Contact with Abusive Persons and / or Risky Environments	EMERGING	Some association with unknown adults and/or other criminally exploited children and/or missing children / Some association with manipulative peers / Some association with gang and county lines involved adults or peers / Increased interest in making money
	MODERATE	Associating with unknown adults and/or other criminally exploited children/young people and/or missing children / Information and police intelligence suggesting involvement in CCE / Associating with possible county lines or gang members / Getting into cars with unknown adults or suspected perpetrators of CCE / New or expensive possessions which cannot be accounted for / Unexplained wealth / Access to cash/money / Spending time in areas where drug activity known to take place or fearful of going to certain areas / Fearful of reprisals from gang members or violence from young people/adults or unidentified persons / Sign of travel (train tickets / cab receipts) / Undertakes 'work' in return for material items or money

	<b>SIGNIFICANT</b>	Identifying as a county lines or gang member / Found in areas/properties known for CCE or drug activity / Evidence or Police Intelligence to suggest being transported out of area of residence for purpose of drug dealing / Abducted and forced imprisonment (described by young person as "locked in")
4. Substance Misuse / Drug possession	<b>EMERGING</b>	Experimenting with alcohol/cannabis / Associating with young people known to use substances regularly
	<b>MODERATE</b>	Regular use of or recent increase in use of illegal substances / Associating with known drug dealers / Seen in known areas for selling drugs / Seen associating with young people who are running and involved in drug lines
	<b>SIGNIFICANT</b>	Evidence of increased use of alcohol/drugs / Found in possession of large quantities of drugs (especially heroin/crack cocaine) / Secretes drugs inside rectum or vagina / Dealing of substances / Stores drugs for others / Found in areas/properties known for drug activity / Supply of substances to others / forced to sell drugs to pay off debts e.g drug debt (debt bondage) / Known to be actively involved in networks that run drug lines
5. Education	<b>EMERGING</b>	Mainly engaged in education, employment or training but exhibits some attendance/behaviour issues / Poor educational achievement / Repeated reports of internal truancy
	<b>MODERATE</b>	Irregular/poor attendance / Truancy from school / Losing interest in education / Periods of exclusion(s) / Whereabouts during school hours unknown/ Poor educational achievement
	<b>SIGNIFICANT</b>	Not in Education, training or employment / Regular breakdown of school placements due to behavioural problems/ Whereabouts during school hours unknown and information suggesting links to CCE/County Lines or Gangs / Poor educational achievement
6. Emotional & Physical Health	<b>EMERGING</b>	Low self-esteem / Some or reduced concerns of self-harm and/or eating disorders / Difficulty in making or maintaining friendships with peers / Increasing use of sexualised language and language in relation to drug dealing and/or violence / Diagnosed or suspected mental health need
	<b>MODERATE</b>	Low self-esteem impacting upon young person's mental health / Increased concerns of self-harm / Violent/emotional outbursts or bullying or threatening behaviour / Offending behaviour / Difficulty in making or maintaining friendships with peers / Concerns young person may be exposed to violence / Increasingly disruptive, hostile or physically aggressive at home/placement or school / Unexplained physical injuries suggestive of physical assault / Attendance at A&E with injuries not consistent with explanation of the subject (only if ABH level of above)
	<b>SIGNIFICANT</b>	Chronic low self-esteem / Changes or extremes in mental health / Expressions around invincibility or not caring about what happens to them / Evidence of self-harm / Attendance at A&E with significant injuries (especially if caused by a knife/weapon)
7. Accommodation and family relationships	<b>EMERGING</b>	Accommodation generally doesn't meet needs of young person / Support unavailable from family/parent/carer / Communication within home environment is lacking / Known peers/older sibling(s) involved in drug distribution/county lines/gangs
	<b>MODERATE</b>	Overcrowding / Living with other young people who are considered to be at risk of CCE / Evidence of decline in relationship and/or communication with family/parent/carer / Known peers/older sibling(s)

		who are suspected to have county lines debts / Lack of parental supervision or interest in the young person
	<b>SIGNIFICANT</b>	Homeless or sofa surfing / Young person often stays elsewhere / Lack of relationship/understanding or trust / Family/friends/peers are known, or suspected victims/perpetrators of CCE / Parent is unavailable to them physically or emotionally
8. Offending / Weapons / Criminal Activity	<b>EMERGING</b>	Coming to the attention of the police / Concerns about being involved with offending peers or associates / Being in possession of cannabis / Talked about or considered carrying a weapon
	<b>MODERATE</b>	Known to be involved in drug related offending / Police intelligence indicating and/or arrested by the police/charged/ investigated for offences of possession of offensive weapon/ possession of drugs/ drug dealing / theft / Known to be connected with drug distribution networks and lines / Receives rewards of money or goods for introducing peers / Arrested out of area when missing / Arrested on public transport (particularly a train)
	<b>SIGNIFICANT</b>	Significant intelligence indicating/charged or convicted of robbery/use of offensive weapon/ possession of large quantities of drugs/possession of large quantity of money / Arrested out of area when missing for drug related offences / Known to be active with drug distribution networks and lines/ recruiting other to run drug lines and to organised crime/ Witness withdrawing statements and suspecting intimidation / Arrested in cuckooed address
9. Community / Social Isolation Factors	<b>EMERGING</b>	Emerging - Is the young person vulnerable to or experiencing low levels of social isolation that may be exacerbated as a result of Deprivation (including a perceived inability or reluctance to access more mainstream support)/ their Ethnicity/ cultural background/cultural dissonance/ being a Child Looked After/ (LBGT)/ their Special Educational Needs (SEND)/ Poor educational achievement or other factors. Some protective community factors present and support evident.
	<b>MODERATE</b>	Is the young person experiencing moderate levels of social isolation that may be exacerbated by Deprivation/ their Ethnicity/ cultural background/ cultural conflict, being a Looked after Child/ their Special Educational Needs (SEND)/ Poor educational achievement or other factors? Some community protective factors are present, but the young person is reluctant to access them / Starting to socialise with or take an interest in pro-offending groups / Aspires to be part of a local gang or anti-social group.
	<b>SIGNIFICANT</b>	Significant - Is the young person experiencing high levels of social isolation that may be exacerbated by deprivation (including being part of an inward-looking community)/ their Ethnicity/ cultural background/ cultural conflict/ being a Looked after Child / their Special Educational Needs (SEND) / Poor educational achievement or other factors / Being targeted by groups or individuals due to their vulnerability / Seeking inclusion/recognition from pro-offending peers or communities / Lack of community protective factors or disengagement by young person / Known to be an active participant in a local gang or anti-social group.

## 37. Appendix 9 - Child Sexual Exploitation – Identification Tool

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Regularly coming home late or going missing
- Overtly sexualised dress, sexualised risk taking (including on the Internet)
- Unaccounted for monies or goods
- Associating with unknown adults
- Associating with other sexually exploited children
- Reduced contact with family and friends and other support networks
- Sexually transmitted infections or unplanned pregnancy
- Experimenting with drugs and alcohol
- Peer on peer, issues including sexualised bullying or sexting with consent
- Poor self-image, eating disorders or self-harm
- Having a much older boyfriend/girlfriend
- Missing school or excluded from school due to behaviour
- Young People changing their phones regularly can indicate change of sim cards
- Getting into cars with unknown adults or associating with known CSE adults
- Being groomed on or offline
- Clipping - (offering to have sex for money or other payment and then running before sex takes place)
- Receiving rewards of money or goods for recruiting peers into exploitation
- Disclosure of physical or sexual assault with no substantiating evidence to warrant sect 47 enquiry and then refusing to make or withdrawing complaint
- Reports of being involved in CSE through being seen in 'hotspots' (i.e., hotels or other commercial premises, recruiting grounds, cars or private addresses of concern and/or in the company of known CSE perpetrators)
- Staying out overnight with no reasonable explanation
- Having an older boyfriend or girlfriend believed to be a risk to young people
- Unaccounted for money or goods including mobile phones, drugs and alcohol
- Multiple sexually transmitted infections (STI's)
- Self-harming that requires medical treatment
- Repeat offending linked to CSE or CSE activity
- Gang member or association with gangs and delinquent peer groups
- Breakdown in residential placements due to behaviour
- Child under 13 involved or coerced into sexual activity
- Pattern of street homelessness and staying with an adult believed to be sexually exploiting them
- Inciting a child under 16 meeting different adults and engaging in sexual activity for goods or a roof for the night Peer on peer abuse (children who pose a risk to others or receiving awards for recruiting)
- Removed from known 'red light' district by professionals due to suspected CSE
- Pattern of street homelessness and or staying with individuals who are likely to be sexually exploiting them
- Being taken to clubs and hotels by adults and engaging in sexual activity as part of grooming
- Being bought sold or trafficked
- Multiple missing episodes
- Disclosure of serious sexual assault and then withdrawal of statement
- Abduction and forced imprisonment
- Being moved around for sexual activity
- Disappearing from the 'system' with no contact or support

- Multiple miscarriages or terminations
- Chronic alcohol and drug use
- Indicators of CSE alongside serious self - harming

Exploitation is an integral part of the county lines offending model with children and vulnerable adults being exploited to move (and store) drugs and money. The same grooming models used to coerce, intimidate and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

## 38. Appendix 10 – Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act<sup>1</sup> introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report ‘known’ cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

### 38.1. What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

### 38.2. Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl’s virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

### 38.3. Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child’s family being from one of the ‘at risk’ communities for FGM (including communities from Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea, Yemen, Afghanistan, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child’s sibling has undergone FGM
- Child talks about going abroad to be ‘cut’ or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities

- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

#### 38.4. The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings/schools/colleges take action without delay and make a referral to children's services.

## 39. Appendix 11 - Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g., surgery to address discomfort or menstrual complications. Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings.

The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications. Staff will be alert to the possible presence of stress, anxiety and other psychological or behavioural signs, and mental health support should be made available where appropriate. Victims face barriers in coming forward, e.g., they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate pupils about the harms of these practices and dispel myths, e.g., the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g., difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g., withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member

- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g., a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

## 40. Appendix 12 – Indicators of Vulnerability to Radicalisation

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public and be made for the purpose of advancing a political, religious or ideological cause.

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.

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 school staff are able to recognise those vulnerabilities.

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.

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.

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.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

#### 40.1. The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent duty". The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

## 41. Appendix 13 – Handling allegations of abuse against pupils

Staff will always, when handling an incident of alleged abuse, take the report of the victim seriously, reassure them, support them and work to keep them safe. Victims will never be made to feel like they are causing a problem by reporting any form of abuse, be made to feel ashamed, or have their experience minimised by staff at the school. Staff will be aware of the importance of not downplaying any reports of abuse; however, will ensure that they remain sympathetic, and observant of the duty of care, to both the alleged perpetrator(s) and victim(s).

If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it, or wait for a disclosure. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves, and the discussion will be handled sensitively and with the help of children’s social care where necessary. If staff are in any doubt, they will speak to the DSL. All staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, and/or they may not recognise their experiences as harmful. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have any concerns.

Where an alleged incident took place away from the school or online but involved pupils from the school, the school’s duty to safeguard pupils remains the same and the incident will be treated equally as seriously and investigated in the same way as an incident that took place in school.

All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the pupil chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the pupil with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure; staff will ensure they remain engaged and not appear distracted.
- Understanding that victims may not disclose the whole picture immediately and may be more comfortable providing information on a step-by-step basis.
- Ensuring that dialogue is kept open and encouraged.
- Only recording the facts as the pupil presents them – not the opinions of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice.
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.

The DSL will be informed of any allegations of abuse against pupils with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

### Confidentiality

The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school will not make this promise. The school will adhere to the principle that, even without the victim’s consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk
- If a pupil is at risk of harm, is in immediate danger or has been harmed, a referral will be made to children's social care
- Rape, assault by penetration and sexual assault are crimes – reports containing any such crimes will be passed to the police

The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

### Anonymity

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved. When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

### Risk assessment

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

Risk assessments will consider:

- The victim.
- The alleged perpetrator.
- Other pupils at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded, either on paper or electronically, and kept under review in accordance with the school's Data Protection Policy.

Taking action following a disclosure

The DSL or a deputy will decide the school's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the pupils involved.
- Any power imbalance between the pupils.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a pupil's life that threaten their safety and/or welfare.
- The best interests of the pupil.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other pupils involved.

For reports of rape and assault by penetration, the alleged perpetrator will be removed from any classes shared with the victim whilst the school establishes the facts. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately. In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Where a pupil is found to have been involved in harmful sexual behaviour, e.g., non-consensually sharing indecent imagery of another pupil, the school will help the pupil to move forward from the incident by supporting them in adopting more positive behaviour patterns and attitudes.

#### Managing the report

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to children's social care or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing early help
- Referring to children's social care
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment are never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons behind decisions will be recorded either on paper or electronically.

The following situations are statutorily clear and do not allow for contrary decisions:

- The age of consent is 16.
- A child under the age of 13 can never consent to sexual activity.
- Sexual intercourse without consent is always rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal - including children making and sending images and videos of themselves.

#### Managing internally

In some cases, e.g., one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

#### Providing early help

The school may decide that statutory interventions are not required, but that pupils may benefit from early help - providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.

All staff will be aware of their local early help process and understand their role in it.

#### Referral to children's social care

If a pupil has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to children's social care. Parents will be informed unless there is a compelling reason not to do so, e.g., if the referral will place the victim at risk. This decision will be made in consultation with children's social care.

The school will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with children's social care to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions. If children's social care decides that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the pupil to be in immediate danger or at risk of harm. If the school agrees with the decision made by children's social care, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

### Reporting to the police

Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to children's social care. The DSL and deputies will follow the local process for referral.

Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the pupil with any decision they take, in unison with children's social care and any appropriate specialist agencies.

The DSL and governing board will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity. The DSL will be aware of local arrangements and specialist units that investigate child abuse.

In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

### Bail conditions

Pupils against whom further action is taken by the police may be released under bail conditions or 'released under investigation' (RUI) in circumstances that do not warrant the application of bail.

Where this occurs and the perpetrator returns to school, the school's primary focus will be conducting an assessment of the risk the perpetrator poses to the victim or other pupils and staff at the school, both physically and in terms of trauma or emotional stress and implementing any mitigating measures necessary to reduce the harm caused.

The school will work with children's social care and the police to support the victim, alleged perpetrator and other pupils, especially witnesses, during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.

The school will liaise with police investigators to develop a balanced set of arrangements whereby both the alleged perpetrator and the victim can continue to receive a suitable education without compromising any ongoing investigations or the emotional state of the victim.

### Managing delays in the criminal justice system

The school will not wait for the outcome, or even the start, of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

### The end of the criminal process

Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations

regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable. The school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

Where an alleged perpetrator is found not guilty or a case is classed as requiring 'no further action', the school will offer support to the victim and alleged perpetrator for as long as is necessary. Staff will be aware that the victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support. The alleged perpetrator will also be offered ongoing support if needed, as they have also been through a difficult and upsetting experience.

The headteacher will carefully consider, on a case-by-case basis, whether allowing the victim and the alleged perpetrator to share classes or attend the same activities is conducive to either party's effective education, and will implement alternative arrangements, in consultation with the DSL (and SENCO where the victim or alleged perpetrator has SEND), where necessary.

### Ongoing support for the victim

Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the school uses to describe the victim
- The age and developmental stage of the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like

Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a step-by-step basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Staff will be aware that victims may struggle in a normal classroom environment. Whilst the school will understand that it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. The school will ensure that this will only happen when the victim wants it to, not because it makes it easier to manage the situation. The school will provide a physical space for victims to withdraw to.

The school will be aware that victims may require support for a long period of time and will be prepared to offer long-term support in liaison with relevant agencies. The school will ensure that everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made. If the victim is unable to remain in the school, alternative provision or a move to another school will be considered - this will only be considered at the request of the victim and following discussion with their parents. If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

### Ongoing support for the alleged perpetrator

Any decisions made regarding the support required for an alleged perpetrator will be made with the following considerations in mind:

- The terminology the school uses to describe the alleged perpetrator
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support
- The reasons why the alleged perpetrator may have abused the victim - and the support necessary
- Their age and developmental stage

- What a proportionate response looks like
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials
- What the outcome of the investigation was

When making a decision, advice will be taken from children's social care, specialist sexual violence services and the police as appropriate. If the alleged perpetrator moves to another school, for any reason, the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

If the reported abuse is found to have taken place, the school will work with professionals, as required, to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

### Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing will not prevent the school reaching its own conclusion and imposing an appropriate penalty.

The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and children's social care will be consulted where necessary. The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time. The school will be clear whether action taken is disciplinary, supportive or both.

Shared classes

Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of pupils will always come first.

Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils.

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator remains at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

### Working with parents

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis. The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

### Safeguarding other pupils

Pupils who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that pupils will "take sides" following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator, and that harassment from friends of both parties could take place via social media, and will do everything in its power to prevent such activity.

As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both the victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

## 42. Appendix 14 – Low-level Concern Reporting Form

### Low-level Concern Reporting Form

Thank you for reporting your concerns to the safeguarding team; we are grateful to you for taking the safety and welfare of our pupils seriously. Please fill in the below form, including as much detail as you can, and return it directly to the headteacher or DSL. Please refrain from discussing this concern with anyone other than the headteacher or DSL until the matter has been dealt with. We ask that you keep all details, including the name staff member to whom the concern pertains, confidential.

Your details	
<b>Name</b>	
<b>Role</b>	
<b>Date and time of completing this form</b>	
Details of individual whom the concern is about	
<b>Name</b>	
<b>Role</b>	
<b>Relationship to the individual reporting the concern, e.g., manager, colleague</b>	
Details of concern	
<b>Please include as much detail as possible. Think about the following:</b> What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	
Details of any children or young people involved	
<b>Name(s)</b>	
<b>Do you believe there is a risk of harm to the above children or young people, either now or in the future, as a result of the individual's behaviour? Explain your answer.</b>	
Next steps	
<b>What would you like to see happen in response to your concern?</b>	
<b>Are you willing to meet with the headteacher and DSL to discuss your concern? Please circle as appropriate.</b>	
<b>Please state any other information that you believe is relevant to the processing of this concern.</b>	
<b>Signature</b>	

For use by safeguarding team upon receipt of concern	
<b>Date and time concern received</b>	
<b>Signature of DSL or deputy DSL</b>	
<b>Actions to be taken</b> (e.g., no action, investigation, reclassification as allegation meeting the harms threshold.)	