



CHILD PROTECTION & SAFEGUARDING POLICY

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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
V1.1		The policy is a new Trust policy, previously this policy was developed at the school level. The document changes are in accordance with KCSIE, September 2021 in line with changes listed in Annex G

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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.

The “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

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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 age 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.

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“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.

“Peer-on-peer” abuse is defined as abuse between children.

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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.

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3.2. Principles

3.2.1. 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.

3.2.2. 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.

3.2.3. Our schools 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;

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- 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;
- children are taught 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.

3.2.4. 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

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4. Links to Legislation and Guidance Documents

4.1. Relevant Internal Policies

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

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

4.2. Relevant External Documents

Legislation, regulations and statutory guidance:

- Keeping Children Safe in Education
- Working Together to Safeguard Children 2018
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014/2020
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015
Non-Maintained Special Schools (England) Regulations 2015
- The Children Act 1989 (and 2004 amendment)
- The Teacher Standards 2011/2012
- Section 5B(11) of the Female Genital Mutilation Act 2003/2019
- The Rehabilitation of Offenders Act 1974/2020
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- Statutory Guidance on the Prevent Duty

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- 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
- Statutory Framework for the Early Years Foundation Stage 2021
- Domestic Abuse Act 2021
- Equality Act 2010 Equality Act 2010
- Data Protection Act 2018
- UST Funding Agreement
- UST Articles of Association

Non-Statutory Guidance:

- DfE (2015) ‘What to do if you’re worried a child is being abused’
- DfE (2018) ‘Information sharing’
- DfE (2017) ‘Child sexual exploitation’
- DfE (2021) ‘Sexual violence and sexual harassment between children in schools and colleges’
- DfE (2021) ‘Recruit teachers from overseas’
- DfE (2020) ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018

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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).
- 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.

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- 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.
- 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.

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- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer 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 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.

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.

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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.
- 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.

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- 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.

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- 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,

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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 role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, 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.

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- 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.
- 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.

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'.

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.

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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, 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.

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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.

LAC and 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.

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

Pupils with SEND

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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.

8. 'One Chance' Rule

All staff are aware of the 'One Chance' Rule particularly in relation to forced marriage, FGM and HBV. 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 HBV 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).

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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.

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13. Looked After Children (LAC) and Previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse and neglect. We ensure that staff have the necessary skills and understanding to keep looked after/previously looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility. Each school has a Designated Teacher for looked after children. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual school head for children in care.

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](#).

14. Children Missing Education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Staff will monitor pupils that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Missing 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 and where the parent/carer has been unavailable to be contacted.

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

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- 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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15. Types of Abuse and Neglect

15.1. 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

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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. 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 DSL(s), 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 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.

15.2. 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.

15.3. 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.

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- 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.

15.4. 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.

15.5. 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.

15.6. 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).

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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.

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15.7. Child Criminal Exploitation (CCE)

KCSIE 2021 describes Child Criminal Exploitation as a form of abuse which involves the coercion, manipulation or deception of the victim by the perpetrator. The victim is coerced (*etc*) into criminal 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. Some specific forms of CCE include ‘children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing’. Children can also be ‘forced or manipulated into committing vehicle crime or threatening / committing serious violence to others’. The victims of CCE can become trapped by this type of abuse ‘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.’

The victims of CCE often commit crimes themselves, and for this reason ‘their vulnerability as victims is not always recognised by adults and professionals, 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.’

KCSIE 2021 says: ‘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.’

County Lines is a specific type of CCE in which children are coerced (*etc*) into delivering supplies of drugs to distant and often unfamiliar locations. Apart from the obvious criminal aspects of this activity, County Lines engages anti-trafficking legislation.

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.

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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.

15.8. 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.

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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.

15.9. Child Sexual Exploitation (CSE)

KCSIE 2021 describes Child Sexual Exploitation 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. “Pupils will be taught ‘What is consent’ – The freedom and capacity to choose.

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.

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- Having older boyfriends or girlfriends.
- 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 indicators of CSE.

15.10. 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.

15.11. Forced Marriage

For the purposes of this policy, a "**forced marriage**" is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional, or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Forced marriage is a crime in the UK and a form of HBA.

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:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.
- Regularly being absent from school.

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Displaying a decline in punctuality.

An obvious family history of older siblings leaving education early and marrying early.

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 and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

15.12. 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. HBV 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.

15.13. 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

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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

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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.

15.14. Child Abduction and Community Safety Incidents

For the purposes of this policy, “**child abduction**” is define 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.

15.15. Peer-On-Peer Abuse

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

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

All staff will be aware that peer-on-peer 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 peer-on-peer 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 peer-on-peer abuse is not occurring. All staff will speak to the DSL if they have any concerns about peer-on-peer abuse.

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

Peer-on-peer 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.
- 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.

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- 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 peer-on-peer abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff will be made aware of the heightened vulnerability of pupils with SEND, who evidence suggests are more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further.

All staff will be made aware of the heightened vulnerability of LGBTQ+ pupils, who evidence suggests are also more likely to be targeted by their peers. In some cases, pupils who are perceived to be LGBTQ+, regardless of whether they are LGBTQ+, can be just as vulnerable to abuse as LGBTQ+ pupils. The school’s response to sexual violence and sexual harassment between pupils of the same sex will be equally as robust as it is for incidents between children of the opposite sex.

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 peer-on-peer 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.

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15.16. 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.

15.17. Online Safety

15.17.1. Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. We empower staff within our Trust to protect and educate pupils in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Our pupils increasingly use electronic equipment to access the internet and share content and images via social media sites such as Facebook, twitter, Instagram, Snapchat etc.

Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as

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pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Each School has an E-Safety Policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents. We will adopt the 4 c's approach as per KCSIE, looking at: Content, Contact, Conduct, Commerce.

We will also provide advice to parents when pupils are being asked to learn on line at home and consider how best to safeguard both pupils and staff. Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

15.17.2. 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.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

15.17.3. 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.

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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.

15.18. Sexting and Sharing of Indecent Images

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where;

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the government guidance on Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to MASH or the Police as appropriate.

Immediate referral at the initial review stage should be made to MASH/Police if:

- the incident involves an adult;

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- there is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- what you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- the imagery involves sexual acts;
- the imagery involves anyone aged 12 or under; and / or
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without escalation to MASH or the police. Such decisions will be recorded.

In applying judgement, the DSL will consider if:

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern
- i.e. difficult home circumstances; and / or
- the children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or MASH. Otherwise, the situation can be managed within the school.

The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

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16. 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.

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.

17. 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.

18. 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.

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19. 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. In the case that the concerns are about a Head of School, the Executive Head will be informed and if the concerns are about the Executive Head, the Chair of the Local Governing Body will be informed.

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, the decision to suspend will be made by the Trust Leader with advice as above. Where allegations are made against the Trust Leader decision will be made by the Chair of the Trust.

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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.

20. 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 (2020) 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

Information sharing is guided by the following principles:

- necessary and proportionate;
- relevant;
- adequate;

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- 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.

21. 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 Peer-on-Peer Abuse procedures.
- The Staff Code of Conduct.
- 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behavioural Policy.
- 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.
- Information about the role and identity of the DSL and deputy DSL(s).

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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.

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:

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

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	safeguarding information		
Governors	Annual update	Annually (usually Autumn Term)	DSL or External Provider
DSL and DDSL	DSL Training	Bi-annually	External provider (usually Local Authority)

22. 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](#).

23. 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.

24. Safer Recruitment

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

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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 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.

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25. 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.

26. 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

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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).

27. 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 in particular, 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.

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- 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.

28. 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 particular 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

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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.

29. 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

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

30. 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.

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31. Appendix 1 – Key Members of Staff Referenced


 Royal Greenwich Trust School		Royal Greenwich Trust School – Key Contacts
Designated Safeguarding Lead		Lee Davey Davey.l@rgtrustschool.net
Deputy Designated Safeguarding Leads		Laura Tutty Tutty.L@rgtrustschool.net
		Olivia Saunders (KS3) Saunders.o@rgtrustschool.net
		Michael Toye (KS4) Toye.m@rgtrustschool.net
Safeguarding Officer		Anitha Nesbitt (KS5) Nesbitt.a@rgtrustschool.net
Teacher for Looked After Children		Laura Tutty Tutty.L@rgtrustschool.net
Headteacher		Caroline Longhurst longhurst.c@rgtrustschool.net
Chair of Governors		Mark O'Thomas Cousins.S@rgtrustschool.net
Safeguarding Governor		Mark O'Thomas Cousins.S@rgtrustschool.net

 St Paul's Way Education · Foundation · Trust		St Paul's Way Foundation School – Key Contacts
Designated Safeguarding Lead		Alice Greenwood alicegreenwood@spwt.net
Deputy Designated Safeguarding Leads		Siobhan Fehim siobhanfehim@spwt.net
Teacher for Looked After Children		Alice Greenwood alicegreenwood@spwt.net
Headteacher		Clare Lynam clarelynam@spwt.net
Executive Headteacher		Phil Akeman pakerman@spwt.net
Chair of Governors		Joe Hall coflaherty@spwt.net
Safeguarding Governor		Sarah Webster coflaherty@spwt.net

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 St Paul's Way Education · Foundation · Trust		St Paul's Way Trust School – Key Contacts
Designated Safeguarding Lead	Firdusi Uddin fuddin@spwt.net	
Deputy Designated Safeguarding Leads	Owen Williams owlliams@spwt.net	
	Gloria Lynch glynch@spwt.net	
	Dionne Mottley dmottley@spwt.net	
Teacher for Looked After Children	Emma McCay EMccay@spwt.net	
Headteacher	Firdusi Uddin fuddin@spwt.net	
	Phil Akerman	
Chair of Governors	Joe Hall coflaherty@spwt.net	
Safeguarding Governor	Sarah Webster coflaherty@spwt.net	

		Cyril Jackson Primary School – Key Contacts
Designated Safeguarding Lead	Hodo Dirir h.dirir@cyriljackson.towerhamlets.sch.uk	
Deputy Designated Safeguarding Leads	Catherine Beckford (Maternity Leave, September 2021 onwards) c.beckford@cyriljackson.towerhamlets.sch.uk	
	Rukeya Begum rukeya.begum@cyriljackson.towerhamlets.sch.uk	
	Sophia Dover s.groome@cyriljackson.towerhamlets.sch.uk	
	Jesslyn Holman jesslyn.holman@cyriljackson.towerhamlets.sch.uk	
	Aysha Islam a.islam@cyriljackson.towerhamlets.sch.uk	
	Lipi Islam lipi.islam@cyriljackson.towerhamlets.sch.uk	
	Alysha Kassam a.kassam@cyriljackson.towerhamlets.sch.uk	
	Mark Ripper m.ripper@cyriljackson.towerhamlets.sch.uk	
Teacher for Looked After Children	Hodo Dirir	

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	h.dirir@cyriljackson.towerhamlets.sch.uk
Headteacher	Hodo Dirir h.dirir@cyriljackson.towerhamlets.sch.uk
Chair of Governors	Sue Stollery sue1@cyriljackson.towerhamlets.sch.uk
Safeguarding Governor	Sue Stollery sue1@cyriljackson.towerhamlets.sch.uk

32. Appendix 2 – Local Authority Contacts

London Borough of Tower Hamlets	
MASH	020 7364 5606/5601 (Mon-Fri, 9am-5pm) MASH@towerhamlets.gov.uk MASH@towerhamlets.gcsx.gov.uk (secure email)
MASH Out of Hours	020 7364 4079
Early Help Hub	020 7364 5006
LADO	0207 364 0677 07903 238827 LADO@towerhamlets.gov.uk

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

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33. Appendix 3 – Links to Legislation and Guidance Documents

- [The Teacher Standards 2011](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education 2020](#)
- [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 2018](#)
- [Education \(Independent School Standards\) Regulations 2014](#)
- [Non-Maintained Special Schools \(England\) Regulations 2015](#)
- [The Children Act 1989 \(and 2004 amendment\)](#)
- [The Teacher Standards 2011](#)
- [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](#)

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33.1. 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/>

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34. Appendix 4 – Child Protection Procedures

34.1. 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. 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.

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.

34.2. 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

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- 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.

34.2.1. 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).

Recording the concern and alerting the DSL should be treated as an urgent priority.

34.3. 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.

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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.

34.4. 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.

34.5. 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.

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35. Appendix 5 – Recognising Signs of Child Abuse

35.1. Categories of Abuse:

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

35.2. Signs of Abuse in Children:

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

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-needing behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression and/or anxiousness
- Age inappropriate sexual behaviour
- Child Sexual Exploitation
- Criminality
- Substance abuse
- Mental health problems
- Poor attendance

35.3. 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:

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- 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.

35.4. 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

35.4.1. 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, hand prints or a hair brush
- 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

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35.4.2. 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.

35.4.3. 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.

35.4.4. 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

35.4.5. Scars

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

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35.5. 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

35.6. 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.

35.6.1. 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)

35.6.2. 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

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- 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

35.7. 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 unresponsive 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

36. 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

36.1. Inappropriate Sexual Behaviour

Can be inappropriate socially, inappropriate 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

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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.

36.2. Abusive sexual activity

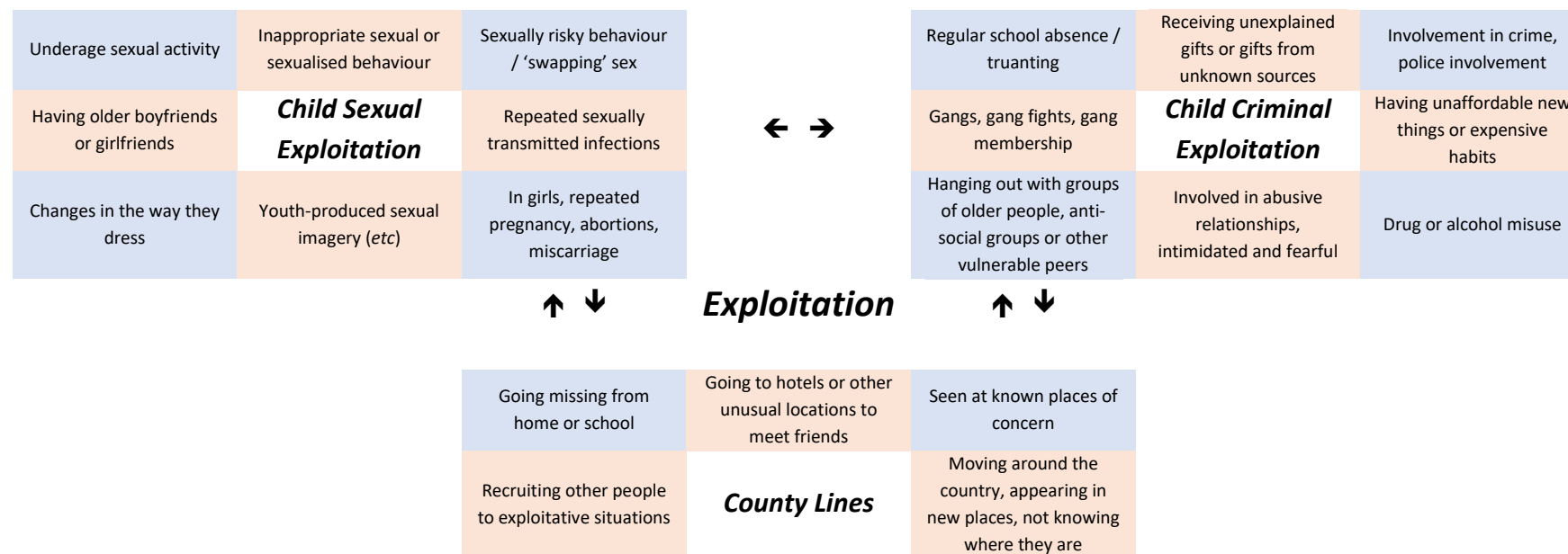
Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation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

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37. Appendix 7 - Indicators of Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE), including County Lines

This is not an exhaustive list of the indicators of CSE, 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.



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Getting in / out of cars
driven by unknown
adults

Having multiple mobile
phones and worrying
about losing contact

Contact with known
perpetrators

38. Appendix 8 - Child Criminal Exploitation Risk Assessment and Management Tool

Subject name:

Date of referral:

Total risk score:

EXPLOITATION RISK CATEGORIES		
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

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	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
	SIGNIFICANT	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	EMERGING	Experimenting with alcohol/cannabis / Associating with young people known to use substances regularly
	MODERATE	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
	SIGNIFICANT	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	EMERGING	Mainly engaged in education, employment or training but exhibits some attendance/behaviour issues / Poor educational achievement / Repeated reports of internal truancy

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	MODERATE	Irregular/poor attendance / Truancing from school / Losing interest in education / Periods of exclusion(s) / Whereabouts during school hours unknown/ Poor educational achievement
	SIGNIFICANT	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	EMERGING	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
	MODERATE	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)
	SIGNIFICANT	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	EMERGING	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
	MODERATE	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
	SIGNIFICANT	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
	EMERGING	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

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8. Offending/Weapons/ Criminal Activity		
	MODERATE	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)
	SIGNIFICANT	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	EMERGING	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.
	MODERATE	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.
	SIGNIFICANT	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.

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39. 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 off line
- 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

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- 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.

40. 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 Act¹ 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.

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40.1. 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.

40.2. 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

40.3. 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 (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, 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

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- Behaviour change 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

40.4. 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.

41. Appendix 11 – Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as:

"Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas."

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

Terrorism is defined by the Crown Prosecution Service as:

"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."

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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.

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The Prevent duty ensures schools and colleges have 'due regard' to the need to prevent people from being drawn into terrorism.

Channel is the voluntary, confidential support programme which focuses on providing support at an early stage to individuals that have been identified as being vulnerable to radicalisation. Prevent referrals may be passed to the multi-agency Channel panel to determine whether individuals require support.

42. Approval Signature

Signature of (enter position e.g. Chair) _____

Print name _____

Date _____

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