



**Child Protection and  
Safeguarding Policy**  
*For September 2018*

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## **1. Legal framework**

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

### **1.1. Legislation**

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- General Data Protection Regulation (GDPR)

### **1.2. Statutory guidance**

- HM Government (2014) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2015) 'Working together to safeguard children'
- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2015) 'Information sharing'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Keeping children safe in education'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'

### **1.3. Other relevant school policies include:**

- Anti-Bullying Policy
- Behaviour for Learning Policy
- Curriculum Policy
- Data Protection Policy
- Drugs Policy
- Equalities Policy
- Exclusions Policy
- Grievance & Discipline Policy
- E-Safety Policy
- Sex & Relationships Policy

## 2. Policy statement and principles

Our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance;
- safer children make more successful learners;
- this policy will be reviewed annually.

### 2.1. Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff and governors and are consistent with those of the local safeguarding children board (LSCB).

### 2.2. Policy principles

- Welfare of the child is paramount;
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- Students and staff involved in child protection issues will receive appropriate support.

### 2.3. Policy aims

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities;
- To ensure consistent good practice;
- To demonstrate the school's commitment with regard to child protection to students, parents and other partners.

## 3. Terminology

**Safeguarding and promoting the welfare of children** refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity.

**Child** refers to all young people who have not yet reached their 18<sup>th</sup> birthday.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

For the purposes of this policy, the term "**harmful sexual behaviour**" includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

In accordance with the DfE's guidance, 'Sexual violence and sexual harassment between children in schools and colleges' (2017), and for the purposes of this policy, the term "**sexual harassment**" is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For the purpose of this policy, the term "**sexual violence**" encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

The term "**teaching role**" is defined as planning and preparing lessons and courses for students; delivering lessons to students; assessing the development, progress and attainment of students; and reporting on the development, progress and attainment of students. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Headteacher to provide such direction and supervision.

#### **4. Roles & Responsibilities**

##### **Key personnel:**

**The Designated Safeguarding Lead (DSL) is James Sheppard (Deputy Headteacher)**  
Contact details: email: [james.sheppard@furzeplatt.net](mailto:james.sheppard@furzeplatt.net) tel: 01628 625308 x123

##### **The Deputy Designated Safeguarding Leads (DDSL) are:**

Laura Lewis (Associate Assistant Headteacher)

Contact details: email: [laura.lewis@furzeplatt.net](mailto:laura.lewis@furzeplatt.net) tel: 01628 625308 x127

Andrew Morbey (Associate Assistant Headteacher)

Contact details: email: [andrew.morbey@furzeplatt.net](mailto:andrew.morbey@furzeplatt.net) tel: 01628 625308 x128

Jemma Barney (Pastoral Manager)

Contact details: email: [jemma.barney@furzeplatt.net](mailto:jemma.barney@furzeplatt.net) tel: 01628 625308 x144

Maxine Carpenter (Pastoral Manager)

Contact details: email: [maxine.carpenter@furzeplatt.net](mailto:maxine.carpenter@furzeplatt.net) tel: 01628 625308 x145

**The nominated safeguarding governor is Diane Flood**

Tel: 01628 625308

**The Headteacher is Andrew Morrison**

Tel: 01628 625308

Due to their day-to-day contact with students, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that school staff are alert to the signs of abuse and understand the procedures for reporting their concerns.

As required by law, the school has a senior member of staff to coordinate child protection arrangements. The local authority maintains a list of all designated senior persons (DSLs) for child protection.

**The Governing Body** ensures that the school :

- complies with its duties under the above child protection and safeguarding legislation;
- policies, procedures and training opportunities are effective and comply with the law at all times;
- contributes to inter-agency working in line with the statutory guidance Working Together to Safeguard Children (2015);
- complies with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions;

- has effective child protection policies and procedures in place together with a staff code of conduct;
- has a governor responsible for safeguarding arrangements;
- has appointed a member of the Senior Leadership Team (SLT) to the role of DSL as an explicit part of the role-holder's job description;
- has appointed one or more deputy DSLs to provide support to the DSL, and ensured that they are trained to the same standard as the DSL and that the role is explicit in their job description(s);
- teaches students about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum;
- adheres to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required;
- ensures that staff members are appropriately trained to support students to be themselves at school, e.g. if they are LGBT;
- guarantees that volunteers are appropriately supervised;
- makes sure that at least one person on any appointment panel has undertaken safer recruitment training;
- ensures that all staff members receive safeguarding and child protection, including Prevent, training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually;
- has procedures in place to handle allegations against members of staff or volunteers;
- has procedures in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned;
- has procedures in place to handle students' allegations against other students;
- has appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff;
- has systems in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse;
- makes sure that students' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual students;
- maintains systems for students to express their views and give feedback;
- 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 to discuss how the student premium funding can best be used to support LAC;
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities;
- ensures that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the student's legal status, contact details and care arrangements;
- has in place appropriate safeguarding responses for students who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future;
- ensures that all members of the governing board have been subject to an enhanced DBS check;
- nominates a member (normally the Chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Headteacher.

An annual report will be submitted to the local authority about how the governing body's duties have been carried out. Any weaknesses will be rectified without delay.

### **The Headteacher:**

- ensures that the child protection policy and procedures are implemented and followed by all staff;
- allocates sufficient time and resources to enable the DSL and DDSLs to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- provides staff, upon induction, with the Child Protection & Safeguarding Policy, Staff Code of Conduct, part one of the Keeping Children Safe in Education (KCSIE) (2018) guidance, Behaviour for Learning Policy, the safeguarding response to children who go missing from education, online safety training, and the identity of the DSL and DDSLs;
- ensures that 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;
- ensures that students' safety and welfare is addressed through the curriculum.

### **The Designated Safeguarding Lead (DSL):**

- refers all cases of suspected abuse to children's social care services (CSCS), the LA designated officer (LADO) for child protection concerns, the DBS, and the police in cases where a crime has been committed;
- refers cases of radicalisation to the Channel programme;
- liaises with the Headteacher to inform him of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- liaises with the DDSLs to ensure effective safeguarding outcomes;
- acts as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies;
- understands the assessment process for providing early help and intervention;
- supports staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate;
- keeps cases of early help under constant review and refer them to the CSCS if the situation does not appear to be improving;
- has a working knowledge of how LAs conduct a child protection case conference and a child protection review conference, and be able to attend and contribute to these effectively when required to do so;
- ensures each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures, including during the staff induction process;
- is alert to the specific requirements of children in need, including those with SEND and young carers;
- keeps detailed, accurate and secure records of concerns and referrals;
- encourages a culture of listening to children and taking account of their wishes and feelings;
- works with the governing body to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly;
- ensures 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;
- links with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding;
- ensures that a student's child protection file is copied when transferring to a new school;
- is available at all times during school hours to discuss any safeguarding concerns;
- holds the details of the LA personal advisor and liaise with them as necessary.
- has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

**The Deputy Designated Safeguarding Leads** are appropriately trained and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the DSL, one of the DDSLs will assume all of the functions above.

**All staff** are expected to:

- safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties;
- know the names of the DSL, DDSLs and members of the safeguarding team;
- read, understand and comply with the school's child protection policy;
- have read 'part one' of 'Keeping Children Safe in Education 2018';
- deal with any bullying incidents that may occur, following proper procedures;
- refer e-safety concerns;
- behave in accordance with our staff conduct policy as per the Staff Handbook.

## **5. Inter-agency working**

- 5.1. The school contributes to inter-agency working as part of its statutory duty;
- 5.2. The school will work with CSCS, the police, health services and other services to protect the welfare of its students, through the early help process and by contributing to inter-agency plans to provide additional support;
- 5.3. The school recognises the importance of information sharing between professionals and local agencies in order to effectively meet students' needs;
- 5.4. In light of the above, staff members are aware that whilst the GDPR places a duty on schools to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the student being placed at risk of harm;
- 5.5. 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 students;
- 5.6. The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

## **6. Good practice guidelines**

To meet and maintain our responsibilities towards students we need to agree standards of good practice. Good practice applies to all staff and includes:

- treating all students with respect;
- setting a good example by conducting ourselves appropriately;
- involving students in decisions that affect them;
- encouraging positive and safe behaviour among students;
- being a good listener;
- being alert to changes in students' behaviour;
- recognising that challenging behaviour may be an indicator of abuse;
- reading and understanding the school's Child Protection and Safeguarding Policy and guidance documents on wider safeguarding issues, for example bullying, physical contact and information-sharing;
- asking the student's permission before doing anything for them of a physical nature, such as assisting with dressing, physical support during PE or administering first aid;
- maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language;
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse.



## **7. Abuse of trust**

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

## **8. Children who may be particularly vulnerable**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur.

To ensure that all of our students receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs;
- living in a domestic abuse situation;
- affected by parental substance misuse;
- asylum seekers;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- live transient lifestyles;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language.

## **9. Early help**

9.1. Early help means providing support as soon as a problem emerges, at any point in a child's life.

9.2. Any student may benefit from early help, but in particular staff will be alert to the potential need for early help for students who:

- are disabled and have specific additional needs;
- have SEND (whether or not they have a statutory EHC plan);
- are young carers;
- show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- are frequently missing/going missing from care or from home;
- misuse drugs or alcohol;
- are at risk of modern slavery, trafficking or exploitation;
- are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse;
- are returned home to their family from care;
- show early signs of abuse and/or neglect;
- are at risk of being radicalised or exploited;
- are privately fostered.

- 9.3. Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.
- 9.4. All staff will be made aware of the local early help process and understand their role in it.
- 9.5. The DSL will take the lead where early help is appropriate.

## **10. Support for those involved in a child protection issue**

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support students, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (DSL) who will keep all parties informed and be the central point of contact;
- nominating separate link people for the child and member of staff, where a member of staff is the subject of an allegation made by a student, to avoid any conflict of interest;
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures;
- co-operating fully with relevant statutory agencies.

## **11. Complaints procedure**

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures which can be found in our **Complaints** policy and **Grievance & Discipline** policy.

## **12. If you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The **Raising Concerns at Work (Whistleblowing)** policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher. Complaints about the Headteacher should be reported to the Chair of Governors.

## **13. Staff who are the subject of an allegation**

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students and we must act on every allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Where an allegation is substantiated and the individual is dismissed or resigns, the school will consider referring the matter to the Teaching Regulation Agency (TRA) for consideration for a prohibition order.

If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, the school may report this concern to CSCS.

Allegations against staff should be reported to the Headteacher. Allegations against the Headteacher should be reported to the Chair of Governors (see Appendix 2.)

## **14. Staff training**

14.1. Staff members will undergo safeguarding and child protection training at induction, which will be reviewed on a termly basis.

14.2. The induction training will cover:

- the Child Protection and Safeguarding Policy;
- the Behaviour for Learning Policy;
- the staff code of conduct
- the safeguarding response to children who go missing from education
- the identities and roles of the DSL and deputy DSLs

14.3. All staff members will also receive regular safeguarding and child protection updates as required, but at least annually.

14.4. will cover, at a minimum:

- the issues surrounding sexual violence and sexual harassment;
- contextual safeguarding;
- how to keep previously LAC safe;
- child criminal exploitation and the need to refer cases to the National Referral Mechanism.

14.5. The DSL will undergo updated child protection training every two years, as well as additional training to refresh skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

14.6. The DSL will also undergo biennial Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff.

14.7. The DSL and DDSLs will undergo online safety training to help them recognise the additional risks that students with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support students with SEND to stay safe online

14.8. Online training will also be conducted for all staff members as part of the overall safeguarding approach.

## **15. Safer recruitment**

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.

### **15.1. Pre-employment checks**

15.1.1. The governing board will assess the suitability of prospective employees by:

- verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available;
- obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity;

- obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the TRA Teacher Services' System;
- verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role;
- checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed;
- if the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed;
- checking professional experience, QTS and qualifications as appropriate using Teacher Services;
- confirming that an individual taking up a management position is not subject to a section 128 direction.

15.1.2. A DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

### **15.2. Internal candidates**

15.2.1. If an individual moves from a position within the school that did not involve the provision of education to one that does, it will be treated as if the individual were a new member of staff and all required pre-appointment checks will be carried out. Aside from this specific circumstance, the school is not required to request a DBS check or barred list check for staff moving roles internally.

15.2.2. References from internal candidates will always be scrutinised before appointment.

### **15.3. ITT candidates**

15.3.1. Where applicants for ITT are salaried by the school, the school will ensure that enhanced DBS checks with barred list information are carried out.

15.3.2. Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

### **15.4. Governors**

15.4.1. Enhanced DBS checks will be completed on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees. Before an individual becomes a trustee, the school will carry out an enhanced DBS check and confirm their identity. Where a trustee also engages in regulated activity, a barred list check will also be requested. An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check. If the individual has lived or has lived outside of the UK, consideration will be given as to further checks that may be necessary.

### **15.5. Those who have lived or worked outside of the UK**

15.5.1. For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

### **15.6. Barred list check**

15.6.1. An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.

15.6.2. If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if he/she has worked in regulated activity in the three months prior to appointment.

15.6.3. Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

## **15.7. References**

- 15.7.1. References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.
- 15.7.2. References will only be accepted from a senior person and not from a colleague.
- 15.7.3. References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.
- 15.7.4. References will be obtained prior to interviews taking place and discussed during interviews.
- 15.7.5. Open testimonials will not be considered.
- 15.7.6. Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.
- 15.7.7. Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

## **15.8. Volunteers**

- 15.8.1. No volunteer will be left unsupervised with a student or allowed to work in regulated activity until the necessary checks have been obtained.
- 15.8.2. An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.
- 15.8.3. Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting washing, bathing and dressing for reasons of age, illness or disability.
- 15.8.4. A supervised volunteer who regularly teaches or looks after children is not in regulated activity.
- 15.8.5. The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.
- 15.8.6. Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.
- 15.8.7. A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

## **15.9. Contractors**

- 15.9.1. The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.
- 15.9.2. Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.
- 15.9.3. Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

## **15.10. Data retention**

- 15.10.1. DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.
- 15.10.2. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

## **15.11. Referral to the DBS**

- 15.11.1. 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.

## **16. Single central record (SCR)**

- 16.1. The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.
- 16.2. All members of the proprietor body are also recorded on the SCR.
- 16.3. 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 section 128 check;
- a check of professional qualifications;
- 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

16.4. For 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 of the necessary checks have been conducted and the date that confirmation was received.

16.5. If any checks have been conducted for volunteers, this will also be recorded on the SCR.

16.6. If risk assessments are conducted to assess whether a volunteer should be subject to a DBS check, the risk assessment will be recorded.

## 17. Extended school and off-site arrangements

Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, we will check that effective child protection arrangements are in place.

## 18. Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect students we will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- ensure students are appropriately dressed
- encourage students to tell us if they are worried about any photographs that are taken of them.

## 19. E-Safety

Mobile phones and computers are a source of fun, entertainment, education and access to social media. However, we know that some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations online, webcam filming, photography or face-to-face meetings. The school's **E-Safety** policy explains how we try to keep students safe in school. Cyber-bullying by students, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and students do not have access to these during the school day. We will take seriously issues that arise from their use out of school, but may advise that the school is not the appropriate agency to deal with such issues.

## 20. Recognising abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by

leaving a small child home alone, or leaving knives or matches within reach of an unattended toddler.

**There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.**

### **20.1. Physical abuse**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

### **20.2. Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child, such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate or valued only for meeting the needs of another person. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. It may feature age – or developmentally – inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### **20.3. Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

### **20.4. Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing or shelter, including exclusion from home or abandonment; failing to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-takers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Definitions taken from *Working Together to Safeguard Children* (HM Government, 2006).

### **20.5. Indicators of abuse – what you might see**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated senior person.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

## **20.6. Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress.

All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All students and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures. To allow or condone bullying may lead to action taken under child protection procedures.

## **20.7. Children missing from education**

A child missing from education for eight sessions or more is a potential indicator of abuse and neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. Should a child go missing from school (education) the Attendance Officer will inform the DSL and contact the Educational Welfare service; the DSL will consider further actions/support should it be required. We will inform the LA of any student admission or a student removed from our roll within five days using the Statutory Notification of Admission/Deletion online form, so that the LA can identify and safeguard children missing from education. For a parental decision to electively home educate we will complete the Notification of parental decision to electively home educate.

The school will inform the LA of any student who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

### **20.7.1. Admissions register**

- Students 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 student will first be attending;



- The school will notify the LA within five days of when a student'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 student where possible;
- Staff will monitor students 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 student will live;
  - The new address;
  - The date from when the student will live at that address;
- If a parent notifies the school that their child will be attending a different school, or is already registered a different school, the following information will be recorded on the admissions register:
  - The name of the new school;
  - The date on which the student first attended, or is due to attend, that school;
- Where a student moves to a new school, the school will use the internet system school2school to securely transfer students' data.
- In order to ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:
  - have been taken out of the school by their parents/carers, 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 neither he/she nor his/her parent has indicated the intention to continue to attend the 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 student from the admissions register where the school and LA has been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.
- If a student is to be removed from the admissions register, the school will provide the LA with the following information:
  - The full name of the student;
  - The full name and address of any parent with whom the student lives;
  - At least one telephone number of the parent with whom the student lives;
  - The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable;
  - The name of the student's new school and the student's expected start date there, if applicable;
  - The grounds for removal from the admissions register under regulation 8 of the Education (Student Registration) (England) Regulations 2006 (as amended);
- The school will work with the LA to establish methods of making returns for students 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.

## **20.8. Students on the child protection register or for whom we have child protection concerns**

The number of students on a child protection plan varies. There are also other students about whom we have child protection concerns who are not on a child protection plan. We support students in various ways by:

- following the guidance set out in any child protection plans
- ensuring they know and are comfortable about whom they can approach for help or if they have specific concerns
- monitoring their welfare carefully, including talking to them regularly about their well-being
- attending any child protection meetings held on their behalf, including speaking on their behalf at such meetings should they request it
- monitoring their attendance carefully and reporting any unexplained absence to social care
- monitoring their academic grades carefully to try to ensure they are making good progress in school
- enlisting the support of and liaising with other agencies as appropriate
- checking that they have access to all elements of school life, including visits and other activities
- informing their Head of House that they are on a CPP without breaching confidentiality so he/she knows to register immediately any concerns however minor with the DSL (or a DDSL).

## **20.9. Allegations of abuse against other students (peer-on-peer abuse)**

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a student's behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student's sexual behaviour, including any known online sexual behaviour, should speak to the DSL or DDSL as soon as possible.

**It is very important that staff report their concerns – they do not need 'absolute proof' that the child is at risk.**

### **20.9.1. Sexual harassment**

- Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment includes:
  - Sexual comments;
  - Sexual "jokes" and taunting;
  - Physical behaviour, such as deliberately brushing against another student;
  - Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

#### 20.9.2. Sexual violence

- Sexual violence refers to the three following offences:
  - Rape: A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents;
  - Assault by Penetration: A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents;
  - Sexual Assault: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

#### 20.9.3. Harmful sexual behaviours

- The term harmful sexual behaviour is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:
  - using sexually explicit words and phrases;
  - inappropriate touching;
  - sexual violence or threats;
  - full penetrative sex with other children or adults;
  - sexual interest in adults or children of very different ages to their own;
  - forceful or aggressive sexual behaviour;
  - compulsive habits;
  - sexual behaviour affecting progress and achievement;
  - using sexually explicit words and phrases;
  - inappropriate touching;
  - sexual violence or threats;
  - full penetrative sex.
- Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not).

#### 20.9.4. A preventative approach

- In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.
- The school will also ensure that students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:
  - Healthy relationships;
  - Respectful behaviour;
  - Gender roles, stereotyping and equality;
  - Body confidence and self-esteem;
  - Prejudiced behaviour;
  - That sexual violence and sexual harassment is always wrong;
  - Addressing cultures of sexual harassment
- Students are allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled

#### 20.9.5. Awareness

- All staff will be aware that students of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.
- All staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted,

- and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.
- All staff will be made aware of the heightened vulnerability of students with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student's SEND and will always explore indicators further.
  - LGBT children can be targeted by their peers. In some cases, children who are perceived to be LGBT, whether they are or not, can be just as vulnerable to abuse as LGBT children. The school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.
  - Students 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.
- 20.9.6. Support available if a child has been harmed, is in immediate danger or at risk of harm
- If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSCS.
  - Within one working day, a social worker will respond to the referrer to explain the action that will be taken.
  - Support available if early help, section 17 and/or section 47 statutory assessments are appropriate
  - If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.
- 20.9.7. Support available if a crime may have been committed
- Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSCS. The DSL will be aware of the local process for referrals to both CSCS and the police.
  - Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.
  - The school has a close relationship with the local police force and the DSL will liaise closely with the local police presence.
- 20.9.8. Support available if reports include online behaviour
- Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.
  - If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed.
  - Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.
- 20.9.9. Managing disclosures
- Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.
  - If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.
  - Where an alleged incident took place away from the school or online but involved students from the school, the school's duty to safeguard students remains the same.
  - All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the child chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the child with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
- Only recording the facts as the child presents them – not the opinions of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice.
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.
- The DSL will be informed of any allegations of abuse against students with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the student in mind at all times.

#### 20.9.10. Confidentiality

- The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.
- The DSL will consider the following when making confidentiality decisions:
  - Parents will be informed unless it will place the victim at greater risk.
  - If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to CSCS.
  - Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.
- The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

#### 20.9.11. Anonymity

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

#### 20.9.12. Risk assessment

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

- Other children at the school, especially any actions that are appropriate to protect them.
- Risk assessments will be recorded (either on paper or electronically) and kept under review.

#### 20.9.13. Taking action following a disclosure

- The DSL or DDSL will decide the school's initial response, taking into consideration:
  - The victim's wishes.
  - The nature of the incident.
  - The ages and developmental stages of the children involved.
  - Any power imbalance between the children.
  - Whether the incident is a one-off or part of a pattern.
  - Any ongoing risks.
  - Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
  - The best interests of the child.
  - That sexual violence and sexual harassment are always unacceptable and will not be tolerated.
- Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.
- For reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.
- For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.
- In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

#### 20.9.14. Managing the report

- The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.
- There are four likely outcomes when managing reports of sexual violence or sexual harassment:
  1. Managing internally
  2. Providing early help
  3. Referral to CSCS
  4. Reporting to the police
- Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.
- The following situations are statutorily clear and do not allow for contrary decisions:
  - A child under the age of 13 can never consent to sexual activity.
  - The age of consent is 16.
  - Sexual intercourse without consent is rape.
  - Rape, assault by penetration and sexual assault are defined in law.
  - Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

#### 20.9.15. Managing internally

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

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

#### 20.9.16. Referral to CSCS

- If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to CSCS. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with CSCS.
- The school will not wait for the outcome of an investigation before protecting the victim and other children.
- The DSL will work closely with CSCS to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.
- If CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.
- If the school agrees with the decision made by CSCS, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

#### 20.9.17. Reporting to the police

- Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to CSCS. The DSL and DDSLs will follow RBWM process for referral.
- Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.
- The DSL and Headteacher will agree, in consultation with the police and CSCS, what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.
- The DSL will be aware of local arrangements and specialist units that investigate child abuse.
- In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

#### 20.9.18. Bail conditions

- Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.
- The school will work with CSCS and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.
- The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.
- Where bail is deemed necessary, the school will work with CSCS and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.

#### 20.9.19. Managing delays in the criminal justice system

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

#### 20.9.20. The end of the criminal process

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

set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.

- The school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).
- Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support.
- The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

#### 20.9.21. Ongoing support for the victim

- Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:
  - The terminology the school uses to describe the victim
  - The age and developmental stage of the victim
  - The needs and wishes of the victim
  - Whether the victim wishes to continue in their normal routine
  - The victim will not be made to feel ashamed about making a report
  - What a proportionate response looks like
- Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.
- Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.
- The school will provide a physical space for victims to withdraw to.
- Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.
- Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.
- If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.
- If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

#### 20.9.22. Ongoing support for the alleged perpetrator

- When considering the support required for an alleged perpetrator, the school will take into account:
  - The terminology they use to describe the alleged perpetrator or perpetrator.
  - The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
  - The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
  - Their age and developmental stage.
  - What a proportionate response looks like.
  - Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.
- When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.
- If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.



- The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the student understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.
- 20.9.23. Disciplining the alleged perpetrator
- Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.
  - The school will make such decisions on a case-by-case basis, with the Headteacher and DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.
  - The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.
  - Disciplinary action and support can take place at the same time.
  - The school will be clear whether action taken is disciplinary, supportive or both.
- 20.9.24. Shared classes
- Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school’s duty to educate against its duty to safeguard. The best interests of the student will always come first.
  - Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.
  - Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other students.
  - Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.
  - Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.
  - In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.
- 20.9.25. Working with parents and carers
- In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.
  - The school will meet the victim’s parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.
  - Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The Headteacher and/or DSL will attend such meetings, with agencies invited as necessary.
  - Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

#### 20.9.26. Safeguarding other children

- Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.
- It is likely that children will “take sides” following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.
- The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- As part of the school’s risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

#### **20.10. Child sexual exploitation (CSE)**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child’s physical and emotional health. It may also be linked to child trafficking. CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual

The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

##### **Identifying cases**

School staff members are aware of and look for the key indicators of CSE; these are as follows:

- Going missing for periods of time or regularly going home late
- Regularly missing lessons
- Appearing with unexplained gifts and new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying changes in emotional wellbeing
- Misusing drugs or alcohol

##### **Referring cases**

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL or a DDSL. Where CSE, or the risk of it, is suspected, local safeguarding procedures will be triggered, including referral to the LA.

##### **Support**

The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

The school includes the risks of sexual exploitation in the PSHE curriculum. A common feature of sexual exploitation is that the child often doesn’t recognise the coercive nature of the relationship and doesn’t see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

The DSL and some DDSLs will have undertaken child sexual exploitation awareness training.

## 20.11. Female Genital Mutilation (FGM)

- 20.11.1. For the purpose of this policy, “**female genital mutilation**”, commonly referred to as FGM, is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs. FGM is a surprisingly common form of abuse in the UK, and the school does have measures in place to safeguard against this type of abuse. Any indications that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this policy.
- 20.11.2. In support of this provision, the school will do everything that it can to ensure that:
- the school is an ‘open environment’, where students feel able to discuss issues that they may be facing;
  - the DSL and DDSLs are aware of the issues surrounding FGM;
  - materials explaining FGM and the issues that surround it are available for staff and students;
  - advice and signposts are available for accessing additional help, e.g. the NSPCC’s helpline, ChildLine services, and appropriate black and ethnic minority women’s groups;
  - girls have access to a private telephone, should they wish to use it;
  - training about FGM is incorporated in the school’s safeguarding training.
- 20.11.3. If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:
- not to reveal to anyone other than the DSL that their enquires might be related to FGM, as this could increase risk to the student;
  - not to engage initially with the student’s parents or family, or others within the community;
  - to alert the school’s DSL to their concerns. This member of staff will then relay concerns to social care, who will inform the police if they need assistance. If a student has disclosed that they are at risk in this way, the case will still be referred to social care even if it is against the student’s wishes;
- 20.11.4. School staff are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.
- 20.11.5. Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so it is important for staff to be sensitive when broaching the subject.
- 20.11.6. Indicators that may show a heightened risk of FGM include the following:
- The socio-economic position of the family and their level of integration into UK society;
  - Any girl with a mother or sister who has been subjected to FGM;
  - Any girl withdrawn from PSHE.
- 20.11.7. Indicators that may show FGM could take place soon include the following:
- The risk of FGM increases when a female family elder is visiting from a country of origin;
  - A girl may confide that she is to have a ‘special procedure’ or a ceremony to ‘become a woman’;
  - A girl may request help from a teacher if she is aware or suspects that she is at immediate risk;
  - A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- 20.11.8. It is important that staff are 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.
- 20.11.9. Indicators that FGM may have already taken place include the following:
- 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;
  - prolonged or repeated absences from school followed by withdrawal or depression;
  - reluctance to undergo normal medical examinations;

- asking for help, but not being explicit about the problem due to embarrassment or fear

Teachers will not examine students, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

FGM is also included in the definition of 'honour-based' violence (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

All forms of HBV are forms of abuse and will be treated and escalated as such.

Staff will be alert to the signs of HBV, including concerns that a child is at risk of HBV, or has already suffered from HBV, and will activate local safeguarding procedures if concerns arise.

## **20.12. Honour based violence**

'Murder or violence in the name of so-called honour' are murders/violence in which, predominantly females, are killed/harmed for actual or perceived immoral behaviour, which is deemed to have breached the honour code of a family or community, causing shame. They are sometimes called 'honour killings/violence'. There is, however, no honour in murder/violence. The honour code means that women must follow rules that are set at the discretion of male relatives and which are interpreted according to what each male family member considers acceptable.

20.12.1. Breaking the rules is seen as destroying the good name of the family, and is deserving of punishment at the discretion of male relatives. Honour is an unwritten code of conduct that involves loss of face on someone's part if offended against, especially in groups where loyalty is considered paramount. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

20.12.2. Signs:

- withdrawal of student from school by those with parental responsibility;
- student/student being prevented from attending higher education;
- truancy or persistent absences;
- request for extended leave or student not returning from an overseas visit;
- surveillance by siblings/cousins/extended family members at school;
- decline in behaviour, engagement, performance or punctuality, poor exam results – in particular for previously motivated student/student;
- decline in physical presentation or demeanour.

## **20.13. Forced Marriage**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to England.

Staff will be alert to the signs of forced marriage including, but not limited to, the following:

- 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;
- Displaying a decline in punctuality;
- An obvious family history of older siblings leaving education early and marrying early.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they 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.

#### **20.14. Preventing radicalisation & extremism**

- Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.
- The school will actively assess the risk of students being drawn into terrorism.
- Staff will be alert to changes in students' behaviour which could indicate that they may be in need of help or protection.
- Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements as appropriate.
- The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.
- Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

##### **20.14.1. Training**

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

##### **20.14.2. Risk indicators**

- Indicators of an identity crisis:
  - Distancing themselves from their cultural/religious heritage
  - Uncomfortable with their place in society
- Indicators of a personal crisis:
  - Family tensions
  - A sense of isolation
  - Low self-esteem
  - Disassociation from existing friendship groups
  - Searching for answers to questions about identity, faith and belonging
- Indicators of vulnerability through personal circumstances:
  - Migration
  - Local community tensions
  - Events affecting their country or region of origin
  - Alienation from UK values
  - A sense of grievance triggered by personal experience of racism or discrimination
- Indicators of vulnerability through unmet aspirations:
  - Perceptions of injustice
  - Feelings of failure
  - Rejection of civic life
- Indicators of vulnerability through criminality:
  - Experiences of dealing with the police
  - Involvement with criminal groups

##### **20.14.3. Making a judgement**

- When making a judgement, staff will ask themselves the following questions:

- Does the student have access to extremist influences?
- Does the student access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the student has been, or is likely to be, involved with extremist organisations?
- Is the student known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the student sympathise with or support illegal/illicit groups?
- Does the student support groups with links to extremist activity?
- Has the student encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the student?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the student?
- Has there been a significant shift in the student's outward appearance that suggests a new social, political or religious influence?
- Has the student come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the student vocally support terrorist attacks, either verbally or in their written work?
- Has the student witnessed or been the victim of racial or religious hate crime?
- Is there a pattern of regular or extended travel within the UK?
- Has the student travelled for extended periods of time to international locations?
- Has the student employed any methods to disguise their identity?
- Does the student have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the student display a lack of affinity or understanding for others?
- Is the student the victim of social isolation?
- Does the student demonstrate a simplistic or flawed understanding of religion or politics?
- Is the student a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the student have insecure, conflicted or absent family relationships?
- Has the student experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?
- Critical indicators include where the student is:
  - in contact with extremist recruiters;
  - articulating support for extremist causes or leaders;
  - accessing extremist websites;
  - possessing extremist literature;
  - using extremist narratives and a global ideology to explain personal disadvantage;
  - justifying the use of violence to solve societal issues;
  - joining extremist organisations;
  - making significant changes to their appearance and/or behaviour.
- Any member of staff who identifies such concerns, as a result of observed behaviour or reports of conversations, will report these to the DSL.
- The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

#### 20.14.4. Channel programme

- Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable student is at risk of being involved in terrorist activities.

- In cases where the school believes a student is potentially at serious risk of being radicalised, the Headteacher or DSL will contact the Channel programme.
- The DSL will also support any staff making referrals to the Channel programme.
- The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.
- The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.
- The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

#### 20.14.5. Building children's resilience

- The school will:
  - provide a safe environment for debating controversial issues;
  - promote fundamental British values, alongside students' spiritual, moral, social and cultural development;
  - allow students time to explore sensitive and controversial issues;
  - provide students with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing;
  - equip students to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments;
  - teach students about how democracy, government and law making/enforcement occur;
  - teach students about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

#### 20.14.6. Resources

- The school will utilise the following resources:
  - Local safeguarding arrangements
  - Local police (contacted via 101 for non-emergencies)
  - The DfE's dedicated helpline (020 7340 7264)
  - The Channel awareness programme
  - The Educate Against Hate website

### 20.15. Homelessness

20.15.1. The DSL and DDSLs will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible;

20.15.2. Indicators that a family may be at risk of homelessness include the following:

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

20.15.3. Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm;

20.15.4. For 16- and 17-year-olds, homelessness may not be family-based and referrals to children's services will be made as necessary where concerns are raised.

### 20.16. County lines criminal activity

20.16.1. County lines criminal activity refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns;

- 20.16.2. Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs;
- 20.16.3. Staff members who suspect a student may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL;
- 20.16.4. The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.

### **20.17. Students with family members in prison**

- 20.17.1. Students with a family member in prison will be offered pastoral support as necessary.
- 20.17.2. 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.

### **20.18. Students required to give evidence in court**

- 20.18.1. Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.
- 20.18.2. Students will also be provided with the booklet 'Going to Court and being a witness' from HM Courts and Tribunals Service where appropriate and allowed the opportunity to discuss questions and concerns.

### **20.19. Contextual safeguarding**

- 20.19.1. Safeguarding incidents can occur outside of school and can be associated with outside factors.
- 20.19.2. School staff, particularly the DSL and DDSLs will always consider the context of incidents – this is known as contextual safeguarding.
- 20.19.3. Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.
- 20.19.4. The school will provide as much contextual information as possible when making referrals to CSCS.

### **20.20. Looked After Students**

We keep a list of students who are looked after by the local authority. In the light of the research that shows that these students fare less well at schools than their peers and to narrow this gap, we monitor their progress and wellbeing carefully by:

- being involved in and following the guidance set out in the student's personal education plan (PEP)
- arranging for one of our safeguarding team (or for another teacher to whom the child relates well) to take a particular interest in the student's welfare and to talk to them regularly offering in school support such as anger management, assertiveness or social skills training as appropriate
- targeting Student Premium specifically to support children in care
- attending any liaison or review meetings held on their behalf, including speaking for them or acting as their
- advocate at such meetings should they request it, and keeping in touch with social workers and/or carers
- monitoring their attendance carefully and reporting any unexplained absence to social care and the Educational Welfare service
- monitoring their academic grades carefully to try to ensure they are making good progress in school
- informing their Head of House that they are on the looked after register without breaching confidentiality so he/she knows to register any concerns speedily to the safeguarding team
- being careful not to accept any under achievement just because the child is 'looked after'
- looking out for difficulties with homework or resources that may be a result of their being in care and giving them help to organise and manage their work and by providing the resources needed



- enlisting the support of and liaising with other agencies as appropriate
- liaison with the student's Virtual Headteacher, who has a responsibility for the educational progress of looked after students
- checking that they have access to all elements of school life, including visits and other activities, and by giving these students the opportunities to take part in those self-esteem projects/residentials organised by the school as and when appropriate
- Members of the safeguarding team will have expertise in SEND (not all)
- In addition we also keep a record of those students who are looked after by someone other than a parent, Adopted or on Special Guardianship plans. We offer them a support package (chosen from the above) appropriate to their particular circumstances.

### **20.21. Private fostering**

Where the school becomes aware of a student being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

### **20.22. Homestay exchange visits**

#### **20.22.1. School-arranged homestays in UK**

- Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay.
- In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.
- Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host.
- In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

#### **20.22.2. School-arranged homestays abroad**

- The school will liaise with partner schools to discuss and agree the arrangements in place for the visit.
- The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.
- The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.
- Students will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

#### **20.22.3. Privately arranged homestays**

- Where a parent or student arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

### **20.23. Young Carers**

It is the responsibility of the DSL (or a DDSL) to keep a record of those students who play the part of a major carer for a family member. However, such families do not often publicise their situation for fear of social care involvement. We offer support to these students appropriate to their individual situation. This support would contain elements of the support offered to students looked after by the local authority.

### **20.24. Students with SEND**

SEND children are more likely to be abused or neglected and for this to go unnoticed. They may be less able to recognise or understand that they are being abused. Communication difficulties may make it harder for them to disclose abuse and/or dependency on their care giver may mean they have no-one to tell. Our SENCo works closely with the safeguarding team to ensure our students have an added layer of protection.

20.24.1. Staff will be aware of the following:

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

20.24.2. When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration.

20.24.3. When managing a safeguarding issue relating to a student with SEND, the DSL will liaise with the school's SENCo, as well as the student's family where appropriate, to ensure that the student's needs are effectively met.

### **20.25. Lesbian, gay, bisexual and transgender (LGBT)**

As a school, we believe that respect for ourselves and others is a fundamental right and responsibility of/for all. It is the duty of all staff to ensure that every member of the school community feels valued, irrespective of their sexual/gender orientation, race or religion.

### **20.26. Other vulnerable students**

Members of the safeguarding team are often aware of students who are vulnerable for other reasons. It is their responsibility to ensure that these students receive support either from a teacher in school to whom the student relates or from an external agency. The student's Head of House will be informed of the situation. This situation might be a temporary one or may be ongoing. This also includes any vulnerable students who may be 18 and over in our Sixth form. Parents/carers are informed of the situation wherever appropriate.

### **20.27. Sexual Images (sexting)**

It is illegal for sexual or indecent images of a child under 18 to be taken and or distributed

- Person/student under 18 creates a sexual image of themselves and shares it with another person under 18
- Person/student under 18 shares an image of another under 18 with another person under 18 or an adult
- Person/student under 18 is in possession of sexual imagery created by another person under 18

All incidents of sexual images should be reported to a member of the safeguarding team. The image/s and the device they are stored within should be confiscated, examples would be:

- naked student
- topless girl
- image which displays genitals
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. 'The primary concern at all times should be the welfare and protection of the young people involved.'

- Refer to the DSL/DDSL
- DSL/DDSL/HoH meets with the student involved
- Do not view the image unless it is unavoidable
- Discuss with parents, unless there is an issue where that's not possible
- If there is a concern that the student is at risk of harm, we will contact social care and/or the police

We will always refer to the police or social care if incident involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent, [e.g., SEN]
- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13
- a young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

### **Impact of abuse**

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

The school will do everything in its power to reduce the impact of abuse as far as is possible during the time that the child is in our care. The action points for this will vary from child to child depending on the type of abuse, their age, circumstances and personal development.

## **21. Communication and confidentiality**

- 21.1. All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies.
- 21.2. Where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents.
- 21.3. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the students involved in the case.
- 21.4. Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis.
- 21.5. During disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why.
- 21.6. Where it is in the public interest, and protects students from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime.
  - Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others.
  - Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.
- 21.7. Depending on the nature of a concern, the DSL will discuss the concern with the parents of the students involved.
- 21.8. Discussions with parents will not take place where they could potentially put a student at risk of harm.
- 21.9. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.
- 21.10. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes etc., with the reasons behind decisions being explained and the available support discussed.
- 21.11. External agencies will be invited to these discussions where necessary.
- 21.12. Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

21.13. Where a student is leaving the school, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival.

## **22. Evaluation of Safeguarding Procedures**

In order to evaluate our safeguarding procedures we will ensure that:

- The DSL and Governor responsible for safeguarding meet at least once a (long) term to review any safeguarding/child protection issues
- The DSL & DDSLs will complete an annual safeguarding audit
- This policy will be reviewed at least annually by the Governing Body (and more frequently if necessary)