



Churchdown School Academy
ACHIEVING SUCCESS FOR ALL

Safeguarding Children Policy

(including Child Protection and Allegations against Staff)

Important Contacts	
Safeguarding Governor:	Poppy Scott Plummer psp@churchdownschool.com
Designated Safeguarding Lead:	Josie Hilton (Deputy Head) 01452 713340 jsh@churchdownschool.com
Deputy Safeguarding Lead:	John O'Connell (Senior Deputy Head) 01452 713340 jpo@churchdownschool.com Gemma Wheeler 01452 713340 gew@churchdownschool.com
Gloucestershire Safeguarding Children Board Helpdesk:	01452 426565 childrenshelpdesk@gloucestershire.gov.uk
Local Authority Designated Officer (LADO):	Nigel Hatton 01452 426994 nigel.hatton@gloucestershire.gov.uk

Contact details for further external agencies can be found at Appendix 10

Ratified by Governing Body on:

Next review date: 1st September 2022

1. Introduction

- 1.1. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002; and in line with government publications including the Teachers' Standards 2012, 'Working Together to Safeguard Children' 2018, Revised Prevent Duty Guidance for England and Wales 2015, Sharing nudes and semi-nudes: advice for education settings working with children and young people 2020, 'Keeping Children Safe in Education' (September 2021) (KCSIE), and the Sexual Violence and Sexual Harassment Between Children in Schools and Colleges advice (September 2021).
- 1.2. Churchdown School Academy (the "School") fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children.
- 1.3. Our policy applies to all staff (including supply and agency staff), Governors and volunteers working in the School. Safeguarding and promoting the welfare of children is everyone's responsibility.
- 1.4. There are five main elements to our policy:
 - Ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with children;
 - Raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
 - Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse, exploitation, or neglect;
 - Supporting students who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan;
 - Establishing a safe environment in which children can learn and develop.
- 1.5. We recognise that because of the day to day contact with children, staff are well placed to identify concerns early and to observe the outward signs of abuse. The School will therefore:
 - Establish and maintain an environment where children feel safe, secure, valued, and respected and are encouraged to talk, believing they will be listened to and taken seriously and will not be made to feel ashamed for making a report;
 - Ensure children know that there are adults in the School whom they can approach if they are worried for themselves or about someone else;
 - Include opportunities in the curriculum, specifically through PSHE, RSE and ICT, for children to develop the skills they need to recognise and stay safe from abuse both at School and at home (including online) and to know who they should turn to for help.
- 1.6. We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm, wherever possible. To this end we will:
 - Ensure there are systems in place for children to express their views and give feedback e.g. through School/class councils, safety questionnaires, participation in anti-bullying and e-safety events;
 - Ensure that the child's thoughts/wishes and feelings are recorded on all referrals;
 - Ensure that a child will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

2. Definition of safeguarding and types of abuse

- 2.1. Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- 2.2. Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and DDSs, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.
- 2.3. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:
 - physical abuse;
 - emotional abuse;
 - sexual abuse; and/or
 - neglect.
- 2.4. Staff are referred to the appendices to this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

3. Safeguarding in School.

- 3.1. We will follow the procedures set out by Gloucestershire Safeguarding Children's Partnership (GSCP) (which comprises of the local authority (LA), the clinical commissioning group within the LA and the chief officer of police) and will also take account of guidance issued by the Department for Education (DfE).
- 3.2. The School will:
 - Ensure it has a senior leader nominated as Designated Safeguarding Lead (DSL) who has received appropriate training and support for this role;
 - Ensure it has at least one member of staff who will act in the absence of the DSL (deputy DSL);
 - Ensure it has a nominated governor responsible for safeguarding children;
 - Ensure every member of staff (including temporary and supply staff and volunteers) and the governing body knows the name of the DSL and any deputies and understands their role;
 - Ensure that the DSL and/or a deputy DSL is always available during School hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
 - Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, including the specific issues of Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Child Criminal Exploitation, Children Missing Education (CME) and

Radicalisation and Extremism, Peer on Peer Abuse, and maintain an attitude of 'it could happen here';

- Ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL or Headteacher in a timely manner and are aware that they may raise concerns directly with Children's Social Care Services if they believe their concerns have not been listened to or acted upon;
- Ensure that parents have an understanding of the responsibility placed on the School and staff for child protection by setting out its obligations in the School prospectus and publishing its policy on the School website;
- Operate a vetting policy which ensures the suitability of adults working with children on School sites at any time;
- Ensure that community users organising activities for children are aware of, and understand the need for compliance with the School's child protection guidelines and procedures;
- Ensure that the duty of care towards its students and staff is promoted by raising awareness of illegal, unsafe, and unwise behaviour and assist staff to monitor their own standards and practice;
- Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of the School's whistleblowing procedures and helplines;
- Be aware of and follow procedures set out by the DfE and GSCP where an allegation of abuse is made against a member of staff or volunteer, including making a referral to the Local Authority Designated Officer (LADO);
- Ensure that a referral is made to the Disclosure and Barring Service (DBS) and/or Teaching Regulation Agency if a person in regulated activity has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been dismissed from working (whether paid or unpaid) in regulated activity or would have been had they not resigned;
- Operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training;
- Ensure that appropriate arrangements are in place to keep children safe where school facilities or premises are hired or rented out to third parties and, where services or activities are provided separately by another body, seek assurance that the body has appropriate safeguarding and child protection policies and procedures in place; and
- Ensure that safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement) as a condition of use and occupation of the premises, and that failure to comply with this would lead to termination of the agreement.

3.3. Our procedures will be regularly reviewed and updated at least annually unless an incident or new legislation or guidance requires the need for an interim review. We recognise the expertise our staff builds by undertaking safeguarding training and managing safeguarding concerns on a daily basis. We therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

4. Training

4.1. When staff join our School, they will be informed of the safeguarding children arrangements in place. Staff who work directly with pupils (Teaching and LSAs) will be given a copy of this policy

including its Appendices, and Annex B of KCSIE, the School's Behaviour Policy and the Staff Code of Conduct and told who the DSL is, who acts in their absence (the DDSLs) and what this role includes. Staff who have limited contact with pupils (site staff, cleaners, catering) will be given Annex A.

- 4.2. All staff will receive an induction in safeguarding children. The induction programme will include basic child protection information relating to concerns around mental health, signs, and symptoms of abuse, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child and advice on safe working practice.
- 4.3. All volunteers, supply staff and regular visitors to our School will be told where our policy is kept, given the name of the DSL and deputy/ies and informed of the School's procedures in reporting concerns.
- 4.4. All staff will receive training in child protection including online safety and harmful sexual behaviours, Prevent, and safe working practice, updated every three years, in line with GSCP guidance. In addition, they will receive safeguarding and child protection updates as required, but at least annually.
- 4.5. Staff with specific responsibility for safeguarding children will undertake both single and inter-agency training at a level suitable to their role and responsibilities, updated every two years. In addition to formal training the DSL and deputy/ies will update their knowledge and skills via GSCP alerts, briefings, meetings, and seminars, at regular intervals, at least annually.
- 4.6. Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, FGM, Radicalisation (WRAP training), Management of Allegations of Abuse and cascade the learning from this training to the rest of the staff.

5. Responsibilities

- 5.1. The Governing Body will nominate a member to be responsible for safeguarding children and liaise with the DSL and or Headteacher in matters relating to safeguarding. It will ensure that:
 - the DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility;
 - the DSL role is explicit in the role holder's job description;
 - safeguarding policies and procedures are in place, available to parents on the School website or by other means and reviewed at least annually;
 - mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of KCSIE;
 - an annual report on the effectiveness of the School's safeguarding procedures is presented to the governing body and submitted to GSCP to meet s175/157 requirements;
 - any weaknesses brought to its attention relating to safeguarding are remedied without delay.
 - it complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism.
- 5.2. The Headteacher will ensure that:
 - The Safeguarding policies and procedures are fully implemented and followed by all staff

- Sufficient resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection.
- All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures;
- All allegations of abuse against staff are reported to the LADO in a timely manner.

5.3. The DSL will co-ordinate action on safeguarding and promoting the welfare of children within the School setting. The DSL is responsible for:

- Organising child protection induction training for all newly appointed staff, whole staff training, refreshed at least every 3 years with annual updates as required, including online safety training;
- Providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one of KCSIE;
- Undertaking, in conjunction with the Headteacher and Safeguarding Governor, an annual audit of safeguarding procedures, using the County safeguarding checklist or similar;
- Making use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Social Care intervention is met;
- Referring a child to the Front Door when there are concerns about possible abuse and neglect;
- Referring a child to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups;
- Keeping written records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately;
- Ensuring all child protection records are kept securely, separate from the main student file, and in locked locations;
- Ensuring that all child protection files are transferred to the new school (separately from the main student file) as soon as possible and within 5 days for an in-year transfer, or within the first 5 days of the start of a new term, within and out of county. In addition to the transfer of the child protection file the DSL will consider whether it would be appropriate to share other information in advance of the child leaving to ensure the right support is put in place to safeguard the child;
- Notifying the key worker if there is an unexplained absence of more than two days of a student who is subject to a child protection plan;
- Monitoring unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in line with 'children missing in education' procedures;
- Developing effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings;
- Contributing to assessments and providing a report to initial and review conferences which has been shared with parents first, whenever possible;
- Co-ordinating a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe on-line, and the promotion of fundamental British values.

- A DSL will always be available during term time (during school hours) for staff to discuss any safeguarding concerns. If a DSL is not available in person, they can be contacted by phone (01452 713340) or email jsh@churchdownschool.com

6. Procedures for Managing Concerns

- 6.1. Our School adheres to child protection procedures that have been agreed locally through the GSCP. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the South West Safeguarding Children procedures and the GSCP Levels of Need Guidance.
- 6.2. Every member of staff, including volunteers working with children at our School, is advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy.
- 6.3. If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on each and every concern in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.
- 6.4. It is *not* the responsibility of School staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 6.5. The DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our School. Any member of staff or visitor to the School who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.
- 6.6. If a disclosure is made by a child, staff should listen carefully; avoid asking leading questions; reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe, and ensure that the child is not made to feel ashamed for making the report of given the impression that they are creating a problem by making the report. Staff should not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child); and should explain to the child that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- 6.7. All concerns about a child or young person should be reported without delay and recorded in writing using CPOMS online system or the agreed template (see Appendix 1 for pro-forma).

- 6.8. Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.
- 6.9. Where there is a safeguarding concern, the School will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its systems with the best interests of the student/s at their heart.
- 6.10. All referrals will be made in line with local procedures as detailed on the Gloucestershire website.
- 6.11. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services immediately and in any event within 24 hours (one working day) of becoming aware of the risk. Anybody can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made.
- 6.12. Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:
- the situation is an emergency and the designated senior person, their deputy and the Headteacher are all unavailable;
 - they are convinced that a direct report is the only way to ensure the student's safety.
- 6.13. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Headteacher. Concerns should always lead to help for the child at some point.
- 6.14. Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Headteacher or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Services directly with their concerns.

7. Special Educational Needs and Disability (SEND)

We recognise that children with special educational needs and disabilities can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying and peer on peer abuse, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

8. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- 8.1. We recognise that CSE and CCE are forms of child abuse which occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.
- 8.2. This type of abuse can have a long-lasting adverse impact on a child's physical and emotional health. Children and young people are often unwittingly drawn into sexual and criminal exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to child trafficking.
- 8.3. The School addresses the risks of sexual exploitation in the PSHE curriculum. A common feature of sexual and criminal 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.
- 8.4. All staff are made aware of the indicators of sexual and criminal exploitation (see Appendix 3) and all concerns are reported immediately to the DSL.

9. Consensual or non-consensual sharing of nudes and/or semi-nudes

- 9.1. All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.
- 9.2. For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.
- 9.3. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.
- 9.4. If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a student or of a student, they should refer the incident to the DSL as soon as possible.

9.5. The DSL will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the student unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance, this policy, and the School's Behaviour Policy.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

9.6. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The School must record the reason for not reporting incidents externally and ensure it is signed off by the Headteacher. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

9.7. This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

10. So called 'Honour Based' Abuse (including Female Genital Mutilation (FGM))

10.1. We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of FGM and other forms of so-called 'honour-based' abuse and provide guidance on these issues through our safeguarding training.

10.2. If staff have a concern regarding a child that might be at risk of honour-based abuse they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Further information can be found at Appendix 6.

10.3. In relation to FGM specifically, staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate.

10.4. Since 31 October 2015 there has been a mandatory reporting duty placed on teachers in relation to FGM. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: '[Mandatory Reporting of Female Genital Mutilation - procedural information](#)' (October 2015).

11. Radicalisation and Extremism

11.1. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submit a referral form to MASH or call them directly. Advice and support can also be sought from children's social care.

11.2. We will ensure that:

- Through training, staff, volunteers, and Governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in School and how to respond when concerns arise.
- In recognition that students may be at risk of being drawn into terrorism or other forms of extremism, we will carry out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area.
- There are systems in place for keeping students safe from extremist material when accessing the internet in our School by using effective filtering and usage policies.
- The DSL has received Prevent training and will act as the point of contact within our School for any concerns relating to radicalisation and extremism.
- The DSL will make referrals in accordance with GSCP procedures and will represent our School at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of students. We encourage students to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.
- Our safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism. Such arrangements are regularly revised.

11.3. Further information regarding radicalisation and extremism and the referral process can be found at Appendix 8.

12. Serious violent crime

12.1. We recognise that that all staff should be aware of the indicators that may signal that children are at risk from, or are involved with, serious violent crime. Including:

- Unexplained gifts/new possessions - these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from School
- Change in friendship/relationships with others/groups, specifically older children
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

12.2. All staff are made aware of the associated risks and understand the measures in place to manage them. Concerns (as opposed to a child being in immediate danger), are reported immediately to the DSL although staff can also make a direct referral to children's social care, if necessary.

13. Mental Health

13.1. We recognise that the School has an important role to play in supporting the mental health and wellbeing of its students.

13.2. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. All staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education. The School aims to prevent mental health problems by promoting resilience as part of our whole school approach to social and emotional wellbeing of our students.

13.3. We acknowledge that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this child protection policy and speaking to the DSL or the deputy DSL.

13.4. Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support teachers to promote positive health, wellbeing and resilience among young people.

14. Peer on peer abuse

14.1. Peer on peer abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual

harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- 14.2. These arrangements apply to all reports and concerns of peer on peer abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.
- 14.3. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures as set out in this policy will apply in respect of any child who is suffering or likely to suffer significant harm.
- 14.4. Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- 14.5. The School acknowledges that even if there have been no reported cases of peer on peer abuse in relation to students within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.
- 14.6. The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the student is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to peer on peer abuse and can recognise the indicators and signs of peer on peer abuse and know how to identify it and how to respond to reports.
- 14.7. The School also recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.
- 14.8. The School recognises that children with SEND or certain health conditions can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children. The School also recognises that certain children may face additional

barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

Arrangements for dealing with peer on peer abuse allegations (including allegations of child on child sexual violence and harassment)

- 14.9. Where the abuse is physical, verbal, bullying or cyber-bullying, sanctions will be applied in line with our Behaviour and Anti-Bullying policies. However, where an issue of student behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should instead follow the procedures below.
- 14.10. The School will take advice from the GSCP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged victim and perpetrator. If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the GSCP, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the GSCP and/ or the police as appropriate.
- 14.11. Where a child discloses safeguarding allegations of a sexual nature against another student in the same setting, the DSL should seek advice from the Front Door or Community Social Worker before commencing its own investigation or contacting parents. This may mean, on occasions, that the School is unable to conduct its own investigation into such incidents. The police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts, and genitalia. Rape, assault by penetration and sexual assaults will always be passed to the police.
- 14.12. In the event of disclosures about peer on peer abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures will be followed. Support for the victims of abuse will be in line with support outlined in the School's Behaviour and Anti-Bullying policies. For victims of sexual abuse, the School should follow advice given by Children's Social Care and consider using external agencies, such as Early Help, Hope House Sexual Health Services or Gloucestershire Rape and Sexual assault Centre (GRASAC) to support any strategies that they may be able to provide within School. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the student and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the GSCP referral process.
- 14.13. Victims will be reassured that they will be supported and kept safe and will never be made to feel that they are creating a problem for making a report and should never have their experience minimised. Depending on the nature of abuse, the School may need to consider providing measures to protect other students in the School by means of a risk assessment. Where there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment which considers the victim, whether there have been other victims, the perpetrator(s), and all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s) or from future harm. Risk assessments will be recorded (written or electronic) and kept under review. The DSL will consider the risks posed to students and put adequate measures in place to protect them and keep them safe and to ensure

that their educational attainment is not adversely affected as far as possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

14.14. The School will keep a written record of all concerns, discussions and decisions made. The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

14.15. In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's Behaviour Policy.

15. Safeguarding concerns or allegations of abuse about a member of staff (including the Headteacher, Governors, supply staff, volunteers and contractors)

15.1. If staff have safeguarding concerns about another staff member (including supply staff, volunteers and contractors), then this concern should be referred to the Headteacher. Where there are concerns about the Headteacher, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Headteacher, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, volunteers and contractors) and refer the matter directly to the LADO.

15.2. We also acknowledge that a student may make an allegation against a member of staff.

15.3. The School's procedures for managing allegations against staff (including supply staff and volunteers) who are currently working in the School follows the DfE, and GSCP procedures and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations which do not meet the above harm threshold should be dealt with using the School's procedure for handling low level concerns set out in paragraph 16 below.

15.4. Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent

allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

- 15.5. If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation/s without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.
- 15.6. When dealing with allegations about a staff member the School will apply common sense and judgement, deal with allegations quickly, fairly and consistently, and will support the person subject to the allegation.

Procedure for handling allegations against staff (including the Headteacher, Governors and volunteers)

- 15.7. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Headteacher or another designated senior teacher. If an allegation is reported to the DSL, the DSL will keep the Headteacher informed. Where the Headteacher is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Headteacher is the subject of the allegation or concern, they must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and make any referral via them.
- 15.8. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.
- 15.9. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
- 15.10. The School has a duty of care to its staff. The School should act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject to the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual

informed of the progress of the case and will consider what other support is appropriate for the individual. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, Working Together to Safeguard Children and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

- 15.11. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
- 15.12. The case manager will ensure that parents are informed of the allegation as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parent or carers should also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.
- 15.13. In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need. The School must also offer appropriate welfare support to the adult subject to the investigation and potentially their family.
- 15.14. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

Possible outcomes

- 15.15. The following definitions should be used when determining the outcome of allegation investigations:
 - Substantiated: there is sufficient identifiable evidence to prove the allegation;
 - False: there is sufficient evidence to disprove the allegation;
 - Malicious: there is clear evidence to prove there has been a deliberate act to deceive and the allegation is entirely false;

- **Unfounded:** there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances;
- **Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

15.16. The case manager will discuss with the LADO whether a referral to the DBS or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

15.17. Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

15.18. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

Confidentiality

15.19. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will not ordinarily be shared with other staff or with children or parents who are not directly involved with the investigation.

15.20. Parents and carers will be made aware of the statutory prohibition on reporting or publishing allegations about teachers as set out in of the Education Act 2002, which includes the publication of material that may lead to the identification of the teacher. If parents or carers wish to apply to the court to have reporting restrictions removed, the School will advise them to seek legal advice.

15.21. The case manager should take advice from the LADO, police, and children's social care services to agree what information can be shared and with whom, as well as how to handle press interest.

Record keeping

15.22. Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a

written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse. All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

15.23. Allegations proven to be false, unsubstantiated, unfounded, or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Headteacher will consider whether any disciplinary action is appropriate against a student who made it in accordance with the School's Behaviour Policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a student.

Procedure for handling allegations against supply staff and contracted staff

15.24. The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business. The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

15.25. In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

15.26. The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

15.27. When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

15.28. Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

16. Arrangements for dealing with Low Level Concerns (i.e. allegations that do not meet the harms test) about staff (including the Headteacher, Governors, supply staff, volunteers and contractors)

- 16.1. A low-level concern is any concern that an adult working in or on behalf of the school or college may have acted in a way that:
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
 - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 16.2. A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).
- 16.3. The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.
- 16.4. The School's Staff Code of Conduct can be found in the policy section of the school website. The aim of the Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place students or staff at risk of harm or of allegation of harm to a student. All staff are expected to comply with the standards contained within this Code of Conduct at all times.
- 16.5. Staff must share all concerns with the DSL (or a deputy) without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the DSL, it should be shared with the Headteacher. If the low-level concern relates to the Headteacher, it should be shared with the Chair of Governors.
- 16.6. Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.
- 16.7. If a concern is raised by a third party, the DSL will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.
- 16.8. The School will address unprofessional behaviour at an early stage and will support the individual to correct it.
- 16.9. All low-level concerns will be recorded in writing by the DSL. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the DPA 2018 and the UK GDPR at all times. The information will be retained until they reach their normal retirement age or for 10 years (whichever is longer)

or until the individual has left employment, whichever is longer. Unfounded malicious allegations will be destroyed immediately.

16.10. Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

16.11. The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate a unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

16.12. Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the DSL (or deputy), and/or the Headteacher. The concern will be recorded in accordance with the School's low-level concern, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

17. Information Sharing & Confidentiality

17.1. We recognise that all matters relating to child protection are confidential.

17.2. The Headteacher or DSL will disclose any information about a student to other members of staff on a need to know basis only.

17.3. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

17.4. The guidance, "Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers" supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 (DPA 2018) and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the DSL.

17.5. All staff must be aware that they must not promise a child to keep secrets which might compromise the child's safety or well-being.

17.6. The Headteacher should take advice from the LADO, police and children's social care services to agree:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

18. Communication with Parents

- 18.1. We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.
- 18.2. We will always undertake appropriate discussion with parents prior to involvement of another agency **unless to do so would place the child or an adult at further risk of harm or would impede a criminal investigation.**
- 18.3. We will ensure that parents have an understanding of the responsibilities placed on the School and staff to safeguard children and their duty to co-operate with other agencies in this respect.
- 18.4. Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may also contact Ofsted directly if they wish.

19. Record Keeping

- 19.1. Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated and signed, with name printed alongside the signature. Concerns will be recorded using the School's safeguarding children recording system.
- 19.2. All records of a child protection nature will be passed to the DSL including case conference or core group minutes and written records of any concerns. Child protection records are kept securely and transferred in a safe and timely manner when a child moves School.
- 19.3. The DSL will maintain and regularly audit the School's child protection records and ensure that each stand-alone file includes a chronology of significant events.

20. Supporting Children

- 20.1. We recognise that some children are potentially at greater risk of harm such as those on Child in need and Child protection Plans. Children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.
- 20.2. We acknowledge that School may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.
- 20.3. We are aware that research shows that at School their behaviour may be challenging and defiant or they may be withdrawn.
- 20.4. The School will endeavour to support all children by:
 - Encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour;
 - Promoting a positive, supportive and secure environment giving students a sense of being valued;

- A consistently applied School Behaviour Policy which is aimed at supporting vulnerable students. The School will ensure that the student knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;
- Liaising with other agencies that support the student such as Children and Young People's Services (CYPS), Educational Psychology Service and those agencies involved in the safeguarding of children;
- The use of Early Help Services (see Appendix 9), through the Front Door, when appropriate;
- Notifying Children's Services immediately there is a significant concern;
- Providing continuing support to a child about whom there have been concerns who leaves the School by ensuring that appropriate information is forwarded under confidential cover to the child's new setting.

20.5. We acknowledge that School has an important role to play in supporting the mental health and wellbeing of students and that mental health problems can sometimes be an indicator that a child has suffered or is at risk from abuse, neglect or exploitation.

20.6. The School will endeavour to support all children by:

- Ensuring that all staff receive appropriate training around the impact of adverse childhood experiences on children's mental health and are able to identify when a child is in need of support
- Ensuring that support is signposted through the PSHE curriculum
- Ensuring that key staff are readily available for students to share their concerns with including Heads of Year, Learning Support Assistants, and the DSL's
- Ensuring that there is a pathway of support available to students including mentors, bespoke interventions, and a School counsellor
- Working with parents to identify how best to support the child both in and out of School
- Working with external agencies (such as CYPS and TiC) to ensure that the child has access to an appropriate level of support

20.7. We recognise that we have a responsibility to ensure that children are taught about safeguarding, including online safety to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching students about the safe use of electronic equipment and the internet, and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people, and vulnerable adults. Relevant issues will be addressed through the PSHE and ICT curriculum and the tutor programme. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

21. Supporting and Supervision of Staff

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

21.2. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or regular supervision, as appropriate.

- 21.3. We will enable supervision for the DSL through network meetings, direct consultation with the Senior Adviser or Consultant Social Workers in order to promote best practice and challenge unsatisfactory or poor practice.
- 21.4. In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour. Further information can be found the School's Code of Conduct.

22. Safer Recruitment and Selection of Staff

- 22.1. The School has a written Recruitment and Selection Policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.
- 22.2. The recruitment process is robust in seeking to establish the commitment of candidates to support the School's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.
- 22.3. All staff working within our School who have substantial access to children (including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches) have been checked as to their suitability before starting work, including verification of their identity, references, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK, including additional overseas checks (if necessary).
- 22.4. The School maintains a single central record of recruitment checks for audit purposes.
- 22.5. All teachers working within our School have been checked using the Teacher Services website to ensure they have been awarded QTS, they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions.
- 22.6. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service. Our Governors are subject to an enhanced DBS check without barred list check.
- 22.7. Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.
- 22.8. Volunteers who are not working in regulated activity, will be supervised at all times.
- 22.9. The School's procedures for managing contractors attending the School site can be found in the Premises Management Policy.

23. Whistleblowing

- 23.1. The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 23.2. All staff should be aware of their duty to raise concerns, where they exist, about poor or unsafe practices and potential failures in the School's safeguarding systems, or the attitude, actions (or inactions) of colleagues using the School's Confidential Reporting (Whistleblowing) Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.
- 23.3. Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors. Where the Headteacher is also the sole proprietor, concerns should be reported directly to the LADO.
- 23.4. Staff will be made aware that if they feel unable to raise a child protection failure internally, or feel that their genuine concerns are not being addressed, they can contact the [NSPCC whistleblowing helpline](#).

24. Complaints or Concerns expressed by Students, Parents, Staff or Volunteers

- 24.1. We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard their welfare.
- 24.2. We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the School will take but also the length of time that will be required to resolve the complaint. The School will also endeavour to keep the child or adult regularly informed as to the progress of their complaint. The School's complaints procedures are readily available.

25. Positive Physical Intervention

- 25.1. Staff are discouraged from using physical interventions and are aware that they must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property.
- 25.2. We understand that physical intervention of a nature that causes injury or distress to a child may be considered under management of allegations or disciplinary procedures.
- 25.3. Staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach technique, or equivalent.
- 25.4. All incidences of physical intervention will be recorded in accordance with the Team Teach recommended procedures.
- 25.5. We recognise that touch is appropriate in the context of working with children and all staff have been given 'safe working practice' guidance to ensure they are clear about their professional boundaries.

26. Abuse of Position of Trust

- 26.1. We recognise that as adults working in the School, we are in a relationship of trust with students in our care and acknowledge that it could be considered a criminal offence to abuse that trust.
- 26.2. We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust.
- 26.3. We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

27. Looked After Children

- 27.1. Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.
- 27.2. The School ensures that staff have the necessary skills and understanding to keep looked after children safe.
- 27.3. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's Virtual Head for children in care and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.
- 27.4. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

28. Children Missing Education (CME)

- 28.1. We recognise that a child going missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including abuse, neglect. Sexual abuse and child sexual and/or criminal exploitation. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent children going missing in the future.
- 28.2. Our procedures for dealing with children that go missing from education are based on the Local Authority and South West Region's Safeguarding Children procedures.
- 28.3. We will ensure that we report children missing education to the LA CME officer, in line with statutory requirements.
- 28.4. Where reasonably possible, the School will hold more than one emergency contact number for each student to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

29. Incidents of discrimination

Our policy on discriminatory incidents is set out in our Anti-Harassment Policy and acknowledges that repeated incidents of discrimination or a single serious incident may lead to consideration under child protection procedures. We maintain a log of incidents in School.

30. Anti-Bullying

- 30.1. Our policy on anti-bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, sexting, racist, homophobic, and gender-related bullying, will be dealt with in accordance with our Anti-Bullying Policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in School.
- 30.2. We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Front Door or to the police.

31. E-safety

- 31.1. All members of staff are trained in and receive regular updates in e-safety and recognising and reporting concerns.
- 31.2. Our ICT Acceptable Use Policy recognises that internet safety is a whole School responsibility (staff, students, Governors and parents).
- 31.3. Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal.
- 31.4. We therefore recognise our responsibility to educate our students, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.
- 31.5. We will ensure that appropriate filters and monitoring systems are in place to prevent access to unsuitable sites and potentially harmful material on the School's systems and we will monitor the use of the School network and internet to ensure that any student or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported. These systems will be reviewed periodically.
- 31.6. The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. Further information about the School's policy on online safety can be found in the Acceptable Use Policy available on the school website.

32. Photography and use of images (including handheld devices)

- 32.1. The welfare and protection of our children is paramount and consideration should always be given to whether the use of photography will place our children at risk. Images may be used to harm

children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.

- 32.2. For this reason, consent is always sought when photographing children using any means and including iPads, smart phones or cameras and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).
- 32.3. Many students own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.
- 32.4. Further information regarding the School's policy on the acceptable use of mobile phones and cameras can be found in the Acceptable Use Policy.
- 32.5. The School provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with students as set out in our Staff Code of Conduct. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

33. Health & Safety

- 33.1. Our Health & Safety Policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the School environment and when away from the School, for example when undertaking School trips and visits.
- 33.2. Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.

34. Safe Environment and Visitors

- 34.1. The School undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.
- 34.2. The School has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of School hours.
- 34.3. Visitors to the School, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.
- 34.4. Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

34.5. Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

35. Private fostering arrangements

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

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

35.3. Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that Schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

35.4. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible.

35.5. If we become aware of a privately fostering arrangement, we will check that Children's Services have been informed.

36. Challenge and Escalation

36.1. We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children.

36.2. As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

36.3. We are aware of the GSCE escalation procedures for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

37. Monitoring and Evaluation

37.1. Our Safeguarding Children Policy and procedures will be monitored and evaluated by:

- Completion of the annual safeguarding audit;
- Completion and return to the LA/GSCE of the annual safeguarding report to the Governing Body;
- Student surveys and questionnaires;
- Discussions with children and staff;
- Scrutiny of data and risk assessments;
- Scrutiny of the School's single central record of recruitment checks;
- Scrutiny of Governing Body minutes;
- Monitoring of logs of bullying/racist/behaviour incidents and PPI records;

- Supervision of staff involved in child protection;
- Case file audits undertaken by the DSL and the GSCE.

38. Related Policies

38.1. The Governing Body's statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures.

38.2. The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Accessibility
- Anti-bullying (including cyber-bullying)
- Attendance
- Behaviour
- British Values Statement
- Complaints Procedure
- Equal Opportunities
- Health and Safety
- ICT and Acceptable Internet Use
- Lone Working Guidance
- Physical Contact with students
- Relationship and Sex education
- Special Educational Needs
- Staff Code of Conduct
- Supporting students with medical conditions
- Trips and visits
- Whistleblowing (Confidential Reporting)

38.3. The above list is not exhaustive but when undertaking development or planning of any kind the School will need to consider safeguarding matters.

APPENDIX 1

Churchdown School Academy Safeguarding Children – Record of Concern / Disclosure



Student:		Tutor Group:		Date:	
Staff:		Signature			
Witnesses:					

Please give a clear and comprehensive account of the concern or incident. Recording who, what where and when factually (continue overleaf if necessary). Also record how the concern/incident was followed up and actions taken, the decision reached and the outcome. Please ensure that you keep this completed form secure at all times and only share it with those that need to be made aware of its content.

DSL Response / Outcome				
DSL Signature:		Date:		

Continuation Sheet

Student:		Tutor Group:		Date:	
-----------------	--	-------------------------	--	--------------	--

Signature:		Date:	
-------------------	--	--------------	--

APPENDIX 2

Recognition & Identification of Abuse

Taken from Working Together to Safeguard Children 2018, Appendix A

All School staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL (or deputy).

What is abuse?

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Indicators of Abuse

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing the circumstances of any child any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

EMOTIONAL ABUSE

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Emotional abuse is difficult to:

- define
- identify/recognise
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism
- Extremes of passivity or aggression
- Children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present
- Babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding
- Toddler/Pre-School – head banging, rocking, bad temper, 'violent', clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills
- School age – Wetting and soiling, relationship difficulties, poor performance at school, non-attendance, antisocial behaviour. Feels worthless, unloved, inadequate, frightened, isolated, corrupted and terrorised
- Adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive and delinquent behaviour
- Child may be underweight and/or stunted
- Child may fail to achieve milestones, fail to thrive, experience academic failure or under achievement
- Also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability

NEGLECT

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

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Neglect can often fit into six forms which are:

- Medical – the withholding of medical care including health and dental.
- Emotional – lack of emotional warmth, touch and nurture
- Nutritional – either through lack of access to a proper diet which can affect in their development.
- Educational – failing to ensure regular school attendance that prevents the child reaching their full potential academically
- Physical – failure to meet the child's physical needs

- Lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger.¹

Common Concerns:

With regard to the child, some of the regular concerns are:

- The child's development in all areas including educational attainment
- Cleanliness
- Health
- Children left at home alone and accidents related to this
- Taking on unreasonable care for others
- Young carers

Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person. It is important to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability. This can be a consequence of:

- Poor health, including mental health or mental illness
- Disability, including learning difficulties
- Substance misuse and addiction
- Domestic violence

School staff need to consider both acts of *commission* (where a parent/carer deliberately neglects the child) and acts of *omission* (where a parent's failure to act is causing the neglect). This is a key consideration with regard to school attendance where parents are not ensuring their child attend school regularly.

Many of the signs of neglect are visible. However, school staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a student is being neglected. Children spend considerable time in school, so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

Physical signs:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- The child seems underweight and is very small for their age
- The child is poorly clothed, with inadequate protection from the weather
- Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are crucially important
- Signs of malnutrition include wasted muscles and poor condition of skin and hair. It is important not to miss an organic cause of failure to thrive; if this is suspected, further investigations will be required
- Infants and children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment
- Failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning

¹ Source: Horwath, J (2007): Child neglect: identification and assessment: Palgrave Macmillan

- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any disability

Behavioural signs:

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- If they are often absent from school for no apparent reason
- If they are regularly left alone, or in charge of younger brothers or sisters
- Lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks
- Craving attention or ambivalent towards adults, or may be very withdrawn
- Delayed development and failing at school (poor stimulation and opportunity to learn)
- Difficult or challenging behaviour

PHYSICAL ABUSE

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

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the DSL without delay so that they are able to seek appropriate guidance from the police and/or Children's Services in order to safeguard the child.

Staff must be alert to:

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern, child too young for the activity described.

Physical signs:

- Bald patches
- Bruises, black eyes and broken
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns
- General appearance and behaviour of the child may include:
 - Concurrent failure to thrive: measure height, weight and, in the younger child, head circumference;
 - Frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.
- Bruising:
 - Bruising patterns can suggest gripping (finger marks), slapping or beating with an object.
 - Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.
- Other injuries:
 - Bite marks may be evident from an impression of teeth
 - Small circular burns on the skin suggest cigarette burns
 - Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
 - Red lines occur with ligature injuries
 - Retinal haemorrhages can occur with head injury and vigorous shaking of the baby

- Tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate.
- Fractured ribs: rib fractures in a young child are suggestive of non-accidental injury
- Other fractures: spiral fractures of the long bones are suggestive of non-accidental injury

Behavioural signs:

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- Fear of suspected abuser being contacted
- Injuries that the child cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

SEXUAL ABUSE

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as peer on peer abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual abuse is usually perpetrated by (but is not limited to) people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, people working with the child in school or through other activities.

Characteristics of child sexual abuse:

- It is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites;

- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.

In young children behavioural changes may include:

- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Being overly affectionate - desiring high levels of physical contact and signs of affection such as hugs and kisses
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
- They may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age
- Starting to wet again, day or night/nightmares

In older children behavioural changes may include:

- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism
- Genital discharge or urinary tract infections
- Marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically
- The child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
- The child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person
- Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

Physical signs and symptoms for any age child could be:

- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Stomach pains or discomfort walking or sitting
- Sexually transmitted infections
- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
- Soreness, itching or unexplained bleeding from penis, vagina or anus
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include

children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children. Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

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

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

SEXUAL HARASSMENT

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be

standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the SVSH advice.

CHILD-ON-CHILD SEXUAL VIOLENCE AND/OR HARASSMENT

Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the SVSH advice.

SHARING OF NUDES AND/OR SEMI-NUDES

The sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics', or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" sets out the classification of incidents, and how each should be handled.

UPSKIRTING

Upskirting is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

SERIOUS VIOLENCE

Indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or

signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

SPECIFIC SAFEGUARDING ISSUES

Other safeguarding concerns are behaviours linked to drug taking, alcohol abuse, truancing and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

MODERN SLAVERY

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "Modern slavery: how to identify and support victims (June 2021)"

CYBERCRIME

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover

'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

MENTAL HEALTH

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or a deputy.

The DfE has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.

SO CALLED 'HONOUR BASED' ABUSE

Encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. Further information regarding FGM and Forced Marriage can be found in the appendices to this policy.

HOMELESSNESS

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

CHILDREN WHO GO MISSING FROM SCHOOL

A child going missing from School is a potential indicator of a range of safeguarding issues including abuse, or neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff

must follow the School's procedures for dealing with children who go missing, particularly persistently. The School's procedure for dealing with children who go missing can be found in the School's Missing Children Policy. All unexplained absences will be followed up.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).¹⁹² This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

CHILDREN AND THE COURT SYSTEM

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

CHILDREN WITH FAMILY MEMBERS IN PRISON

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

APPENDIX 3

Child Sexual Exploitation (CSE) and Child Criminal Exploitation

Child Sexual Exploitation

Child sexual exploitation is a form of abuse which involves children (male and female, of different ethnic origins and of different ages) receiving something in exchange for sexual activity.

'Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.' (DfE – February 2017)

The definition and further guidelines can be found in the DfE document : Child sexual exploitation - Definition and a guide for practitioners

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Who is at risk?

Child sexual and criminal exploitation can happen to any young person from any background. Although the research suggests that the females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity, or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually or criminally exploitative situations but do so from coercion, enticement, manipulation, or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child protection issue.

CSE WARNING SIGNS AND VULNERABILITIES CHECKLIST²

² The Office of the Children's Commissioner (2012) Interim Report - Inquiry into Child Sexual Exploitation in Group and Gangs.

The evidence available points to several factors that can increase a child's vulnerability to being sexually or criminally exploited. The following are typical **vulnerabilities in children prior to abuse**:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality)
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of 'honour'-based violence, physical and emotional abuse, and neglect)
- Recent bereavement or loss
- Gang association either through relatives, peers, or intimate relationships (in cases of gang-associated CSE only)
- Attending school with young people who are sexually exploited
- Disabilities, special educational needs and/or certain health conditions
- Mental health needs
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families
- Friends with young people who are sexually exploited
- Homeless
- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation or a foyer
- Low self-esteem or self-confidence
- Young carer

The following signs and behaviour are generally seen in children who are **already being sexually exploited**:

- Missing from home or care
- Physical injuries
- Drug or alcohol misuse
- Involvement in offending
- Relationships with older people
- Repeat sexually-transmitted infections, displaying sexual behaviours beyond expected sexual development, or pregnancy and terminations
- Persistently absent from school
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- Estranged from their family
- Receipt of gifts from unknown sources
- Recruiting others into exploitative situations
- Poor mental health
- Self-harm
- Thoughts of or attempts at suicide

Evidence shows that any child displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation.

All schools should ensure that there is a dedicated lead person with responsibility for implementing local guidance in respect of child sexual exploitation. This would normally be the DSL.

The DSL must ensure they are aware of the guidance on Child Sexual Exploitation on the GSCE website: <https://www.gscb.org.uk/im-a-child-or-young-person/child-abuse/who-to-contact-if-you-are-you-worried-about-abuse/>

The DSL must ensure that all staff are aware of signs and symptoms of CSE and know that these must be reported and recorded as child protection concerns. The DSL must follow the Gloucestershire Pathway for dealing with issues of CSE, including completion of the screening tool.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child Criminal Exploitation

Child criminal exploitation (CCE) is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines – see below) forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, alternative provision, special educational needs schools, children’s homes, and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- who go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

CCE / COUNTY LINES WARNING SIGNS

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts, money, or new possessions;
- children who associate with other children involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

CCE (including county lines) is child abuse and should be treated as a child protection issue. The DSL must ensure that all staff are aware of signs and symptoms of CCE and county lines and know that these must be reported and recorded as child protection concerns.

APPENDIX 4

Effects of domestic abuse on children and young people

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

The impact of domestic abuse on the quality of a child’s or young person’s life is very significant. Children and young people who live with domestic abuse are at increased risk of serious and long-lasting behavioural problems, emotional trauma, and mental health difficulties into adult life. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

Physical: Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

Sexual: There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops, and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

Economic: The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development.

Emotional: Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

Isolation: Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home, they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from school as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

Threats: Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear, and vulnerability, which can lead to high anxiety, tension, confusion, and stress.

This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the five outcomes as outlined in the *Every Child Matters* agenda:

- be healthy;
- stay safe;
- enjoy and achieve;
- make a positive contribution;
- achieve economic well-being.

What you might see in school

- Unexplained absences or lateness – either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school;
- Children and young people attending school when ill rather than staying at home;
- Children and young people not completing their homework, or making constant excuses, because of what is happening at home;
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home;
- Children and young people displaying difficulties in their cognitive and school performance;
- Children and young people whose behaviour and personality changes dramatically;
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations;
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims;
- Children and young people who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

What schools can do

Schools can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.

For many victims, the school might be the one place that they visit without their abusive partner.

It would help if schools displayed posters or had cards/pens available with information about domestic abuse and contact details for useful agencies: for example, NSPCC **0808 800 5000** and ChildLine **0800 11 11**; Parentline **0808 800 2222**; Gloucestershire Domestic Abuse Support Service (GDASS) 0845 602 9035 or Email: support@gdass.org.uk.

Gloucestershire Constabulary - Police Domestic Abuse Units 101.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by schools as part of the whole school ethos.

Schools can support individual children and young people by:

- Introducing a **whole-school philosophy** that domestic abuse is unacceptable;
- **Responding to disclosures** and potential child protection concerns; recognising that domestic abuse and forced marriage may be a child protection concern; policies and procedures must include domestic abuse;
- **Giving emotional support** – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.;
- **Facilitating a peer support network** – children and young people can become isolated but often welcome talking to friends about their problems;
- **Offering practical support** – if children or young people are new to the School they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.;
- **Providing somewhere safe and quiet** to do their homework or just to sit and think;
- **Improving the self-esteem and confidence** of children and young people by:
 - offering them opportunities to take on new roles and responsibilities;
 - offering tasks which are achievable and giving praise and encouragement;
 - monitoring their behaviour and setting clear limits;
 - criticising the action, not the person;
 - helping them to feel a sense of control in their school lives;
 - involving them in decision making;
 - helping them to be more assertive;
 - respecting them as individuals;
 - encouraging involvement in extra-curricular activities.

From The Expect Respect Education Toolkit – Women's Aid

Advice for schools on receiving notification of a Domestic Abuse incident

Background

Following a call to a domestic abuse incident where children are involved, police notify Social Care and Health. A domestic abuse triage meeting takes place each day within the Multi-Agency Safeguarding Hub (MASH) where the notifications are sorted into low, medium and high risk, depending on the perceived level of risk to the children. For those cases that are classified medium or high, the school DSL will receive

an e-mail via their secure communications system from the MASH informing them that an incident has taken place. For high risk cases, they will also be contacted by telephone and asked whether they have any concerns about the children at school. Social Care will also inform parents that the notification has been received and shared with other agencies and that the information will be treated confidentially.

School action

On receiving this information, the DSL should:

- Log the information and keep the record alongside other information/concerns that the school has on this child/family, with all other confidential CP records in a secure place. This will allow the school to recognise any pattern and/or frequency of notifications and take appropriate action. **Please note that school may receive further communication about this same incident, once further assessment of the situation has been undertaken by police – be careful not to log this as a separate incident.**
- Inform any staff of notification on a 'need to know' only basis – e.g. class teacher/form tutor.
- Alert all staff who teach student/student with minimum of information – e.g. 'This student/student may need extra support / may need extra time to complete homework'.
- Monitor student/student behaviour in school (including attendance) and should concerns arise which may be attributed to the impact of the incident, consult with Social Care through the Front Door as the concerns may be significant and lead to new safeguarding action, or to seek advice on how to proceed.
- Provide appropriate support for child, **if required** – do not question student/student about the incident. Respect the child's decision on whether or not they wish to discuss the situation.
- Provide appropriate support for adult, **if asked** – e.g. helpline number (0800 980 3331) or <http://www.gdass.org.uk/>

Bear in mind

- Victim of incident may be anxious that the information will be shared inappropriately.
- Notification may not give details as to which parent is the perpetrator/victim – any disclosure to the 'wrong' parent could heighten risk.
- Need to be aware who is 'connected' to the child – e.g. TA/lunchtime supervisor may be child's relative / friend of the family.
- **Inappropriate sharing of information could heighten the risk for the victim and/or the child.**

If in doubt, consult with the Front Door (01452 426565)

APPENDIX 5

Forced Marriage – a form of Domestic Abuse

Forced Marriage should be recognised as a human rights abuse – and should always invoke child protection procedures within the school.

A forced marriage is a marriage conducted without the full consent of both parties, and one where duress is a factor. A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

Warning signs

Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

The justifications

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon — there have been cases involving families from East Asia, the Middle East, Europe, and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parents who force their children to marry often justify it as protecting them, building stronger families, and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim, and Sikh marriage.

Culture

Often parents believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parents come under significant pressure from their extended families to get their children married.

The law

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

In addition, the Forced Marriage (Civil Protection) Act (2007) makes provision for protecting children, young people and adults from being forced into marriage without their full and free consent through Forced Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence.

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence, with effect from 16th June 2014, to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the marriage takes place);
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured into it or not).

What to do if a student seeks help

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to Children's Services, you will need to consider whether to respect the student's wishes — or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform the student.
- Establish whether there is a family history of forced marriage — i.e. siblings forced to marry.
- Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Liaise with police and Children's Services to establish if any incidents concerning the family have been reported.
- Refer to the local Police Child Protection Unit if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

What to do if the student is going abroad imminently

The Forced Marriage Unit advises education professionals to gather the following information if at all possible — it will help the unit to locate the student and to repatriate her:

- a photocopy of the student's passport for retention — encourage her to keep details of her passport number and the place and date of issue
- as much information as possible about the family (this may need to be gathered discretely)
- full name and date of birth of student under threat
- student's father's name
- any addresses where the student may be staying overseas
- potential spouse's name
- date of the proposed wedding
- the name of the potential spouse's father if known
- addresses of the extended family in the UK and overseas

Specific information

It is also useful to take information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission — in case another person of the same age is produced pretending to be the student.

Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student — a secret mobile telephone, for example, that will function abroad.

Forced marriage: what educators should NOT do

- treat such allegations merely as domestic issues and send the student back to the family home
- ignore what the student has told you or dismiss the need for immediate protection

- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- contact the family in advance of any enquires by the police, Children's Services or the Forced Marriage Unit, either by telephone or letter
- share information outside child protection information sharing protocols without the express consent of the student
- breach confidentiality except where necessary in order to ensure the student's safety
- attempt to be a mediator

Further guidance is available from The Forced Marriage Unit:

Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday

Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500

E-mail: fmf@fco.gov.uk **Website:** www.fco.gov.uk/forcedmarriage

FMU publication: *'Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage'* June 09

See also: *'The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage'* Government Office - November 2008 and Interagency Guidance on Forced Marriage on the WSCB website.

Ref: GSCE procedures, section 3.6b of the DSL Handbook <https://www.gscb.org.uk/media/19429/dsl-handbook-version-live10-dec-17.pdf>

APPENDIX 6

Female Genital Mutilation (FGM) – a form of Human Rights Abuse

What is FGM?

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

Type 1 – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)

Type 2 – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the 'lips' that surround the vagina)

Type 3 – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris

Type 4 – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as 'female genital cutting' or female circumcision. Communities tend to use local names for this practice, including 'sunna'.

Why is FGM carried out?

It is believed that:

- It brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage.
- It preserves a girl's virginity/chastity.
- It is part of being a woman as a rite of passage.
- It upholds the family honour.
- It cleanses and purifies the girl.
- It gives the girl and her family a sense of belonging to the community.
- It fulfills a religious requirement believed to exist.
- It perpetuates a custom/tradition.
- It helps girls and women to be clean and hygienic.
- It is cosmetically desirable.
- It is mistakenly believed to make childbirth safer for the infant.

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them 'a better Muslim'. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Within which communities is FGM known to be practised?

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leonean, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

Is FGM harmful?

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

Is it illegal?

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004:

The act makes it illegal to:

- practise FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country
- aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

Signs, symptoms and indicators

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- a child talking about getting ready for a special ceremony
- a family arranging a long break abroad
- a child's family being from one of the 'at-risk' communities for FGM (see above)
- knowledge that an older sibling has undergone FGM
- a young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child has undergone FGM:

- prolonged absence from school or other activities
- behaviour change on return from a holiday abroad, such as the child being withdrawn and appearing subdued
- bladder or menstrual problems

- finding it difficult to sit still, and looking uncomfortable
- complaining about pain between their legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinal tract infection
- disclosure.

What should schools do?

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the police as required by the mandatory reporting duty. Schools should not:

- contact the parents before seeking advice from children's social care;
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM.

The 'one chance' rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

Mandatory Reporting Duty

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Further information on when and how to make a report can be found in the following Home Office guidance: ['Mandatory Reporting of Female Genital Mutilation - procedural information'](#) (October 2015).

APPENDIX 7

Sharing Nudes and semi-nudes

What do we mean by sharing nudes and semi-nudes?

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts. Nude or semi-nude images, videos or live streams may include more than one child or young person.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex. There are also a range of risks which need careful management from those working in education settings.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically:

- it is an offence to possess, distribute, show and make indecent images of children
- the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18

What to do if an incident comes to your attention

Any direct disclosure by a child or young person should be taken seriously. A child or young person who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in the education setting is a last resort and they may have already tried to resolve the issue themselves.

When a disclosure is made, the member (or members) of staff should ensure the child is feeling comfortable and appropriate and sensitive questions are asked, in order to minimise further distress or trauma to them.

Any incidents which come to your attention or any direct disclosures must be reported to the Designated Safeguarding Lead (DSL) or equivalent immediately following the procedures outlined in the schools child protection policy.

Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal.**

If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

Do not delete the imagery or ask the young person to delete it.

Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame any young people involved.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Informing parents and carers

Parents or carers should be informed and involved in the process at an early stage unless informing them will put a child or young person at risk of harm.

The DSL will make the decision to refer to the police and / or children's social care based on the level of risk after and establishing the facts of the incident.

Any decision not to inform the parents or carers should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.

For further information

Download the full guidance, [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (UKCIS, 2020)

APPENDIX 8

RADICALISATION AND EXTREMISM

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

Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. It can also call for the death of members of the armed forces, whether in this country or overseas.

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

What is Prevent?

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, **in all its forms**. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including schools and colleges, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping children safe by:

- Ensuring a broad and balanced curriculum is in place schools to promote the spiritual, moral, social and cultural development of students;
- Assessing the risk of students being drawn into extremist views;
- Ensuring safeguarding arrangements by working in partnership with local authorities, police and communities;
- Training staff to provide them with the knowledge and ability to identify students at risk;
- Keeping students safe online, using effective filtering and usage policies.

Warning Signs/Indicators of Concern

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Students may become susceptible to radicalisation through a range of social, personal and environmental factors. It is vital that school staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Factors which may make students more vulnerable may include:

- **Identity Crisis:** the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- **Personal Crisis:** the student may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with

a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.

- **Personal Circumstances:** migration; local community tensions and events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations:** the student may have perceptions of injustice; a feeling of failure; rejection of civic life.
- **Experiences of Criminality:** involvement with criminal groups, imprisonment, poor resettlement or reintegration.
- **Special Educational Need:** students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

Students who are vulnerable to radicalisation may also be experiencing:

- Substance and alcohol misuse
- Pressure
- Influence from older people or via the Internet
- Bullying
- Domestic violence
- Race/hate crime

Behaviours which may indicate a child is at risk of being radicalised or exposed to extremist views could include:

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Students accessing extremist material online, including through social networking sites;
- Possessing or accessing materials or symbols associated with an extremist cause;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Students voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause;
- Changing their style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause;
- Using insulting to derogatory names for another group;
- Increase in prejudice-related incidents committed by that person – these may include:
 - physical or verbal assault
 - provocative behaviour
 - damage to property
 - derogatory name calling
 - possession of prejudice-related materials
 - prejudice related ridicule or name calling

- inappropriate forms of address
- refusal to co-operate
- attempts to recruit to prejudice-related organisations
- condoning or supporting violence towards others
- Parental reports of changes in behaviour, friendship or actions and requests for assistance;
- Partner schools, local authority services, and police reports of issues affecting students in other schools.

Referral Process

All concerns about young people vulnerable to radicalisation should be referred to the DSL in the first instance. The DSL will follow safeguarding procedures including:

- Talking to the young person about their behaviour/views/on-line activity/friends etc.;
- Discussion with parents/carers about the concerns;
- Checking out on-line activity, including social media if possible;
- Providing in-house support, if available;
- Providing Early Help targeted support if necessary.

If concerns persist, then the DSL should follow Gloucestershire GSCE's guidance to the Prevent Referral Pathway and contact the Family Front Door for advice (childrenshelpdesk@gloucestershire.gov.uk), normally with the knowledge and consent of the young person.

The referral will then be subject to a triage process to decide whether or not it meets the threshold for a referral to Channel. If it does, the DSL should be prepared to attend the Channel Panel meeting to share the concerns and help identify any intervention required. Further feedback to the Channel Panel will be expected following intervention to decide whether there are still concerns.

In the event of a child leaving the School, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Further information can be found on the GSCE website: <https://www.gsce.org.uk/i-work-with-children-young-people-and-parents/issues-affecting-children-and-young-people/radicalisation-and-extremism/>

APPENDIX 9

EARLY HELP

Early help is an umbrella term that describes the work of many agencies involved with children and families. Early Help means providing support as soon as a problem appears, in order to prevent further problems arising. We believe that early interventions for children or families, in many cases, will prevent children from experiencing harm. Early Help is about finding the best support, at the right time, in order for a child to thrive. Churchdown School Academy's co-ordinated offer of Early Help is outlined in the table below.

Churchdown School's Early Help Offer	
Designated Safeguarding Lead and Deputy DSL's	The Safeguarding team at Churchdown School works closely together to ensure best possible safeguarding practices are in place. The DSL, Ms Hilton (Deputy Head) is supported by the Deputy DSL, Ms Wheeler, who is a non-teaching member of staff and therefore able to offer immediate support as needed. Mr O'Connell (Senior Deputy Head) is also a trained DSL and is able to lead the safeguarding team in the DSL's absence. Head's of Year are also trained to a high level. Staff are trained to share any emerging concerns with the DSL who will put a plan in place, or seek further advice, to support the child or family as needed. In the first instance, staff who consider that a student may benefit from early help should discuss this with the School's DSL. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the student's situation does not appear to be improving.
School Nurse	We work closely with our School nurse who is able to provide advice and guidance to students and parents on a variety of health and wellbeing issues. She visits School regularly to meet with students and meets with the DSL, parents, carers as and when required.
CAMHS	We have access to regular consultations with our Primary Mental Health Worker who is able to provide advice on supporting children and making referrals in to CAMHS. Our PMHW will also signpost other agencies that may be able to offer more appropriate support.
School Counsellor	Mrs Davis, our School counsellor offers support to students from all year groups. This is through regular, timetabled appointments or drop-in sessions. In addition to this she also offers group sessions around emotional wellbeing and managing anxiety.
Attendance Officer and Education Welfare Officer	Our School operates a 'first day calling system' if a child's absence is unexplained. Our Attendance Officer (Mrs Martin) will contact home if we have not been contacted by a parent or carer to inform us of their child's absence. Every child whose attendance is below 95% is carefully monitored by our Education Welfare Officer (Mrs Colin). Mrs Colin will contact parents by phone or letter alerting parents to falling attendance. She will also conduct home visits and formal attendance meetings if required. Support will always be offered to families wherever possible.

SENDCo	Ms Seales is our SENDCo. Her role is to oversee the support and provision of students on the SEN register and to ensure that they are making the best possible progress and meeting their full potential. Mrs Seales also oversees provision for many students who do not appear on our SEN register but have been identified as needing additional support. Ms Seales regularly meets with parents and professionals to offer support and guidance.
EAL Support	Zdravie Davies is our EAL Advisory Teacher. She provides targeted and individualised programmes to support language acquisition and vocabulary for EAL children. She is also able to translate letters and support parent/carers/teacher meetings.
Educational Psychologist	Our School enlists the support of the Education Psychology Service who offer support and advice to both children and staff to ensure the best learning outcomes. The EP team use their knowledge of child development to assess difficulties they may be having with learning, as well as engaging adults in collaborative discussions about how to remove barriers to learning and develop strategies to support the inclusion of students with additional needs within lessons.
Advisory Teaching Service	
Breakfast Club	
Peer Mentoring	Our Year 12 students are trained as peer mentors to support our Year 8 students. The support they offer ranges from targeted academic support to literacy and pastoral support. The Year 12 students often continue mentoring their Year 8 students the following year.
Social and Emotional targeted interventions	Our Learning Support Department offer a range of programs for both individuals and groups aimed at supporting the emotional wellbeing of our students. These run throughout the year and include: <ul style="list-style-type: none"> • Emotion Coaching • Chimp Paradox • Reflective Conversations • Drama Workshops • Dance Workshops
Positive behaviour and School values	All staff at Churchdown School Academy promote positive behaviour consistently with our School values being at the heart of everything we do. All children are encouraged to demonstrate the five values of ambition, respect, resilience, friendship and integrity. These values are also promoted in assemblies and through the PSHE curriculum.
PSHE Curriculum	Our School delivers comprehensive Personal, Social, Health Education (PSHE) in which the 2020 guidance for Relationships and Sex Education (RSE) is embedded. RSE is reinforced through the tutor program (Wellbeing Wednesday). The PSHE curriculum broadens students understanding of strategies to develop their resilience, their awareness of their mental health and understanding and forming health relationships. In addition to this, it signposts the support that is available both in School and outside of School. Materials from the PSHE Association are used to support the curricular requirements

Online Safety	Work around online safety is embedded within the PSHE curriculum and reinforced through the tutor program (Wellbeing Wednesday) and in ICT lessons. In addition to this, we raise awareness through taking part in national initiatives: Safer Internet Day and Online Safety day. Additionally, we work with Digital Awareness UK with students and parents of Year 7 and Year 10.
Extra-curricular provision	Extra-curricular clubs are offered to all children to encourage a healthy lifestyle, relationship building, physical activity and sports, social development skills and enhancement of the curriculum. The clubs may vary between year groups and throughout the academic year. Extra-curricular clubs are offered both during lunch time and after School. Homework clubs are also offered for students in all year groups.
CPD and Training	Our staff are highly skilled at recognising the signs that a family may need Early Help and referring them into our safeguarding team. The School invests in high quality CPD such as Mental Health Awareness and Adverse Childhood Experience training in order to be able to support children and families in the right way at the right time
PREVENT	All staff are required to complete PREVENT Training and are aware of the procedures for referring concerns.
Female Genital Mutilation	The DSL has completed an accredited online FGM course (Sept 2019) and all staff have received training on FGM Teachers know how to identify if a child may be at risk. They are aware of the countries and places within this country where children may be taken to for this to happen. They know the signs to look for and most importantly how to refer, following the Schools safeguarding procedures. In addition to this, FGM is covered within the PSHE curriculum to increase students awareness.
Child Sexual Exploitation	The DSL has targeted CSE training and is equipped with the knowledge to be able to identify early indicators of potential cases of child sexual exploitation. In such cases, the CSE screening tool is used.

Appendix 10

Useful contacts

Local Authority Designated Officer	Nigel Hatton 01452 426994 Nigel.hatton@gloucestershire.gov.uk
Local Authority Children's Social Services	TEL: 01452 426565 EMAIL: childrenshelpdesk@gloucestershire.gov.uk OUT OF HOURS EMERGENCY DUTY TEAM TEL: 01452 614194
Multi-Agency Safeguarding Hub	TEL: 01452 426565 (option 3)
Support and Advice about Extremism	Police TEL: 0800 011 3764 EMERGENCY: 999 NON EMERGENCY NUMBER: 101 Local Authority Gloucestershire County Council TEL: 01452 425000 Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk
NSPCC Report Abuse in Education Advice Line	TEL: 0800 136 663 EMAIL: help@nspcc.org.uk
NSPCC Whistleblowing Advice Line	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk
Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@db.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT

	TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk

KEY SCHOOL CONTACT DETAILS

Trustees	<p>Chair of Governors Chris Widden TEL: 01452 713340 EMAIL: cjw@churchdownschool.com</p> <p>Nominated Safeguarding Governor Poppy Scott Plummer TEL: 01452 713340 EMAIL: psp@churchdownschool.com</p>
Designated Safeguarding Lead ("DSL") and Deputy Designed Safeguarding Lead ("DDSL")	<p>DSL Josie Hilton (Deputy Head) TEL: 01452 713340 EMAIL: jsh@churchdownschool.com</p> <p>DDSLs John O'Connell (Senior Deputy Head) TEL: 01452 713340 EMAIL: jpo@churchdownschool.com</p> <p>Gemma Wheeler TEL: 01452 713340 EMAIL: gew@churchdownschool.com</p>
Head	David Potter TEL: 01452 713340 EMAIL: ddp@churchdownschool.com