



# Child Protection & Safeguarding

SCHOOL POLICY & PROCEDURE

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# Child Protection and Safeguarding Policy

## Statement of Intent

Talbot House Childrens Charity (“the Charity”) is committed to safeguarding and promoting the welfare, both physical and emotional, of every pupil both inside and outside of the school premises. Our staff understand from the outset that safeguarding is everyone’s responsibility. We implement a whole-school preventative and proactive approach, centred on the child. We always ensure that the wellbeing of pupils is at the forefront of any action taken, including assessing the risks and issues in the wider community context.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. We will achieve this by:

- Creating a culture of safer recruitment through the use of procedures that help identify, deter and reject people who might pose a risk of harm to children.
- Teaching pupils how to be safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil who is or has been subject to abuse.
- Ensuring that members of the Governing Board, the Senior Management Team (SMT) (Chief Executive, Head of Development and Deputy Chief Executive, Head Teacher) and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, knowing how to refer concerns and escalate the matter to achieve the best impact for the child.
- Providing good quality and appropriate training designed to create a professional team of Designated Safeguarding Leads (DSLs) and Deputies (DDSLs).
- Creating a culture of good safeguarding awareness by way of robust training and induction procedures for staff.

The terms “children” and “child” refer to anyone under the age of 18. For the purpose of this policy, safeguarding and protecting the welfare of children is defined as:

- Protecting pupils from maltreatment.
- Preventing the impairment of pupil’s health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.

There are four main elements to our approach to safeguarding and child protection:

**Prevention** – positive school atmosphere, careful and vigilant teaching, pastoral care, support to pupils, providing good adult role models and the identification of early and additional support/services to children and families. Recognising and reducing risks to children including harassment, bullying, victimisation, sexual violence and sexual harassment, criminal and sexual exploitation, preventing radicalisation (extremism, radicalisation and terrorism) and issues such as honour based abuse, female genital mutilation and forced marriage.

**Reconsideration** – following and challenging the process of new referrals and existing cases to ensure that individual cases are reconsidered if there remains no improvement to a child’s circumstances.

**Support** – for pupils and school staff and for children who may be vulnerable due to their individual circumstances or extra-familial harm and taking action to enable all children to have the best outcomes.

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## 1. Legal Framework

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

### 1.1 Legislation:

- Children's Act 1989.
- The Education Act 2002.
- Non Maintained Special Schools (England) Regulations 2015.
- Safeguarding Vulnerable Groups Act 2006, amended by Protection of Freedoms Act 2012.
- Sexual Offences Act 2012.
- The General Data Protection Regulations (GDPR) and Data Protection Act 2018.
- Human Rights Act 1998
- Public Sector Equality Duty and Equality Act 2010

### 1.2 Statutory guidance:

- DfE (2020) 'Working Together to Safeguard Children'.
- DfE (2015) 'The Prevent duty'.
- DfE (2023) 'Keeping children safe in education'.
- DfE (2018) 'Disqualification under the Childcare Act 2006'

### 1.3 Non-statutory guidance:

- DfE (2018) 'Information sharing'.
- DfE (2017) 'Child sexual exploitation'.
- DfE (2020) 'Criminal exploitation of children and vulnerable adult: County Lines'.
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'.

## 2. Roles and Responsibilities

Any individual who has contact with children and their families has a role to play in safeguarding them. Due to regular contact with children (and family members), staff at Talbot House Children's Charity hold a particularly important role in safeguarding, and they are frequently held in a position of trust within the child's home. This enables us to identify concerns early, provide help and ensure concerns are acted upon effectively and in a timely way so that any risk of harm to a child can be prevented from escalating. Children may make disclosures to any individual and show signs of abuse, neglect or other child protection or safeguarding concerns at any time. Therefore, everyone has a responsibility to safeguard children. The Charity has three Designated Safeguarding Leads (DSLs) and two deputies (DDSLs) committed to ensuring the schools statutory duty on child protection is met. They are identified visually in posters around the entire site, and are detailed below:

Designated Safeguarding Leads (DSL)	Christine Smiles	Head Teacher
Designated Safeguarding Leads (DSL)	Deirdre Pearson	Chief Executive Officer
Designated Safeguarding Leads (DSL)	Jo Reiling	Head of Development & DCEO
Deputy Designated Safeguarding Leads (DDSL)	Gavin Jackson	Assistant Head Teacher/SENDco
Deputy Designated Safeguarding Leads (DDSL)	Karen Cowans	Family Liaison Coordinator
Board Member for Safeguarding and Child Protection	Louise Cannell-Mirrza	Governor & Trustee

### 2.1 The Board of Trustees has a duty to:

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- Enable a whole school, child centre approach.
- Ensure that the school complies with its duties under child protection and safeguarding legislation with effective policies, procedures, training and appropriate code of conduct. This includes (but is not limited to) those policies which stipulate arrangements for **Allegations, Safer Recruitment, Behaviour, Online Safety, Whistleblowing, GDPR, Complaints, Equality, Disciplinary and Missing Children (as well as Children Missing in Education)**.
- Follow Charity Commission guidance on trustee duties on safeguarding.
- Appoint a board member who is responsible for holding the DSLs to account on safeguarding activity and arrangements.
- Appoint an appropriate group of senior staff to undertake the roles of DSL and DDSLs and include those specific responsibilities within the job descriptions of those staff. Training with a recognised Child Protection in Education (CAPE) affiliated provider should be provided every two years.
- Promote the contribution to inter-agency working in line with statutory guidance and ensure the school complies with its obligation to supply parties within the local area safeguarding partnership with the information required by them.
- Ensure that arrangements are in place to allow staff members to have due regard to relevant data protection principles so they may share personal information appropriately.
- Ensure the child protection policy details measures to protect children from abuse (including peer-on-peer) and manage disclosure of such.
- Ensure the governing body receives training to clarify their statutory role in keeping children safe to support their quality assurance (monitoring) of those statutory arrangements.
- Training the Governing Board receive will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. The training will be regularly updated.
- Make sure that pupils are taught about safeguarding, including protection against danger online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, which includes appropriate relationships and sex education.
- Adhere to statutory responsibilities by following safer recruitment (making sure at least one member of any selection panel has relevant training) and making decisions on whether to ask for any checks beyond what is required for new employees.
- Ensure sufficient budget is available to meet safeguarding and child protection standards.
- Ensure that all staff members receive safeguarding and child protection training updates, through CPD as required, but at least annually and that safeguarding training is provided at induction for new staff.
- Ensure that there are procedures in place to handle allegations against members of staff or volunteers. Where this is an allegation against a member of the SMT, the chair must liaise with the local authority and partner agencies including the Local Authority Designated Officer (LADO).
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), if a person in a regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Ensure that there are appropriate filtering and monitoring systems in place for online content to ensure that staff and visitors follow the **Online Safety Policy**.

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- Ensure the SMT and relevant staff have an awareness and understanding of the provisions in place, manage them effectively and know how to escalate concerns when identified.
- Consider the age range of the children, the number of children, how often they access the IT system and proportionately of costs verses safeguarding risks.
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Ensure there are processes in place for identifying possible mental health problems, including routes to escalate and clear referral accountability systems.
- Ensure child protection files are maintained as detailed in Annex C of KCSIE 23.
- Ensure that all school staff understand that additional barriers can exist when recognising abuse and neglect for children with special education needs.

## 2.2 The Head Teacher has a duty to:

- Safeguard pupils' wellbeing.
- Ensure that the policies and procedures adopted by the SMT and governing board, particularly concerning suspected abuse and neglect, are embedded and followed up by staff members.
- Provide staff, upon induction and via HR, with all safeguarding documents (including but not limited to):
  - **Child Protection and Safeguarding Policy**
  - **Staff Code of Conduct**
  - **Keeping Children Safe in Education (KCSIE)**
  - **Behaviour, Absconding, Allegations, Equal Opportunities Policies for both pupils and staff**
  - **Working Together to Safeguard Children**
- Provide for all new staff, access to the allegations flow charts, DSL and DDSL identifying posters and their phone number.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensure that school staff understand the additional vulnerabilities of children with SEND, in relation to those attending our school.
- Take a proportionate approach to the level of information provided to temporary or supply staff.

## 2.3 The DSLs/DDSLs have a duty to:

- Understand and keep up-to-date with local safeguarding and child protection arrangements, including online safety and understanding the filtering and monitoring systems and processes in place.
- Make the necessary child protection referrals to appropriate agencies and manage the results of those referrals in order to improve the situation for the child.
- Liaise with other DSLs and the SMT to inform them of the safeguarding issues and ongoing enquiries.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Undergo regular safeguarding supervision with the intention of improving outcomes for children. This should take place at least quarterly, and results and discussions should be recorded.



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- Be able to attend and contribute to a child protection case conference effectively when required to do so.
- Ensure each member of staff has access to and understands the school's safeguarding policy and procedures.
- Be alert to the specific requirements and expected outcomes where a child is the subject of either a Child in Need (CIN) or Child Protection (CP) plan.
- Keep detailed, accurate and secure records of concerns and referrals.
- Attend any relevant training courses with appropriate accreditations at least every two years.
- Maintain a level of expertise in local issues by regular attendance at safeguarding refresher events (termly recommended, but at least annually).
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Work with the Head Teacher to ensure the school's safeguarding policy is reviewed annually and that it is available publicly. Make sure parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Ensure that a pupil's child protection file is transferred when transferring to a new school as soon as the pupil moves and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. All new admissions files are requested from previous schools where CP or CIN has been a factor previously.
- Ensure that any files are secure in transit and obtain confirmation of receipt.
- Be prepared to undertake professional challenges with outside agencies if it is felt that any action or inaction has been ineffective in reducing the risk of harm to the child or children.
- Encourage staff to seek resolutions to concerns raised about a child with a DSL or DDSL, and agree that they are satisfied with the action taken and its impact.
- Advocate for the child in any meeting where appropriate (put the child in the room).
- Familiarise themselves with the local threshold document published by Safeguarding partners, which includes the process for the local early help assessment and the type and level of early help services to be provided.

## 2.4 All staff members have a responsibility to:

- Provide a safe environment in which pupils can learn.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment, and victimisation, including those in relation to peer-on-peer abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect including those relating to sexual violence, sexual harassment, and exploitation.
- Understand relevant data protection legislation, including information which is sensitive and personal and maintain appropriate levels of confidentiality when dealing with individual cases, whilst always acting in the best interest of safeguarding the child.
- Never promise to keep a secret for a child when hearing a disclosure.
- Make a referral to Children's Social Care Services (CSCS) and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Be aware of and understand the procedures to follow in the event that a child confides they are being abused or neglected.
- Follow the school's procedure for, and approach to, preventing radicalisation as outlined in this policy and government guidance for Prevent.

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- Challenge senior leaders over any safeguarding concerns, where necessary.
- Identify children who may benefit from early help as soon as a problem emerges and bring it to the attention of appropriate staff.
- Staff must also ensure they are extra vigilant whilst working in the period post lockdown and whilst we continue to address the ongoing health and safety issues relating to the global pandemic.

### 3. Multi-Agency Working

Children and families may have connections with many different organisations (agencies) and individuals. Schools and relevant agencies should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.

Schools have a pivotal role to play in multi-agency safeguarding. We will facilitate multi-agency working by:

- Contributing to multi-agency working as part of our statutory duty.
- Being aware of local safeguarding arrangements as published on Local Authority (LA) websites and specific to the host LA for the child.
- Recognising the importance of proactive and early information sharing between professionals and local agencies.
- Working with the CSCS, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support and a coordinated approach. This may include allowing access to information so that a S47 or S17 assessment may take place.
- Identifying that a need for early help exists and following this, allow access for CSCS from the host LA and any other appropriate partner (incl. siblings' schools, and other agencies). A coordinated approach must then be offered with staff contributing to Early Help, CIN and CP plans where appropriate.
- Ensuring staff members are aware that whilst the GDPR and Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully they also allow information to be stored and shared for safeguarding purposes. Data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm or would negatively affect their welfare.
- Ensuring staff members who are unsure about sharing information know to speak to the DSL(s) or DDSL(s).

### 4. Abuse and Neglect

Teachers and other school staff are in an optimal position to prevent, identify, and assist victims of child abuse and neglect because of their frequent contact with pupils. A DSL or DDSL will be informed immediately by an employee of the Charity, pupil of the school, parent or other adult, in either of the following circumstances:

- **SUSPICION** that a child is being harmed.
- There is **EVIDENCE** that a child is being harmed.

The threshold of significant harm is defined in the Children Act 1989 Section 31 (9), and amended by the Adoption and Children Act 2002 as:

**'Harm'** means ill-treatment or the impairment of health or development, including for example impairment suffered from seeing or hearing the ill-treatment of another;

**'Development'** means physical, intellectual, emotional, social or behavioural development;

**'Health'** means physical or mental health; and



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'Ill-treatment' includes sexual abuse and forms of ill-treatment that are not physical.

**The appendices in this policy give full definitions of the elements described within the main body of the document.**

## 4.1 Abuse and neglect awareness

Staff members and any other adult providing support or care for children within the school will be alerted to the following elements:

- Children experiencing abuse or neglect may display a combination of indicators. A single sign or indicator should not be taken as proof that a child is being abused or neglected. Stand-alone events of abuse, neglect or safeguarding concerns are rarely stand-alone events, more often multiple issues will overlap one another.
- Staff will be provided with training in Keeping Children Safe in Education at least annually. Updates will be provided as they occur.
- Local area specific training will be provided to DSLs termly and any prevent elements communicated to staff during CPD.
- Half termly CPD dedicated to safeguarding will be provided.
- Child criminal and sexual exploitation indicators.
- County Lines and gang membership indicators.
- Indicators of abuse and the appropriate action to take following a pupil being identified as a potential risk of abuse or neglect as noted below or on the NSPCC website.
- An awareness of online abuse, sometimes stand-alone, but also often used as a gateway tool for actual physical or sexual abuse.
- Peer-on-peer abuse and child-on-child sexual violence or sexual harassment.
- All staff should have an awareness of wider safeguarding concerns which can put children at risk of harm. Issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger and may be part of the wider context around abuse and neglect.

## 4.2 Possible indicators of abuse or harm

When identifying pupils at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, inconsistent with their age
- Missing hair that is also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge, crime
- Use of explicit language (again dependent on age or stage)
- Fear of abandonment
- Depression and low self-esteem
- Gang membership
- Grooming indicators, gifts or money
- Behaviour; possibly sexual or general inappropriate to age or stage
- Physical presentation; may be dirty or seem unkempt
- Marks on their bodies or faces; bruising, bite marks, wounds or burns
- Losing or gaining weight
- Physical and mental health deterioration (see mental health indicators)

## 4.3 Mental Health indicators

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. Staff should ensure they consider:

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- Any onset of declining mental health as a possible indicator of abuse or neglect.
- 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 other potentially traumatic adverse childhood experiences, the impact can last throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can affect 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 by reporting it to a DSL or DDSL or emergency services if required.
- First, seeking advice about a child's declining mental health from mental health first aiders on site, and then report in to the correct agency according to government guidance.

## 4.4 Child Exploitation and Grooming

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in either sexual or criminal activity. These forms of abuse can affect both male and female children and can be brought about in exchange for something the victim needs or wants under threat of violence or actual violence. Children can be moved (trafficked) for the purpose of exploitation. Full definitions are in Appendix C. Staff should be aware that:

- Girls who are criminally exploited are at great risk of sexual exploitation.
- CCE can include children being forced to steal, transport or hold drugs (County Lines), work in drug production, vehicle crime, theft and serious violence.
- Vulnerable children who are victims of CCE may not be seen as such by the authorities since they are often committing crimes themselves. Even if they consent, it should be remembered that they may be experiencing harm themselves via threats, actual violence, or threats to family members or they may have been trapped into debts they are forced to repay with criminal acts.
- We will advocate for children in this situation.
- CSE is sexual abuse, and this may be physical, including assault by penetration (rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
- CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.
- CSE can affect any child (person under 18), even if they consent, who has been coerced into engaging in sexual activities. Some children may not realise they are being exploited and may believe they are in a genuine romantic relationship.

## 4.5 Female Genital Mutilation (FGM), Forced Marriage and Other 'Honour Based' Violence

It is important that all staff recognise that FGM, Forced Marriage and so-called 'Honour Based' violence; are all forms of abuse and are illegal in this country. The full definition is within Appendix C along with a list of specific indicators. Staff understand that:

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- FGM is defined as the partial or total removal of the external female genitalia or any other injury to the female genital organs. Staff who suspect there is a plan for a child to be subjected to FGM, or that it has already taken place, should immediately inform a DSL who will inform the police and CSCS. There are specific legal duties for teachers who discover an act of FGM appears to have taken place on a girl under 18, they must ensure it is reported to the police. However, all staff at Talbot House will be expected to ensure they take the same action, whether a teacher or not. Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquires can be made to protect others, and criminal investigations can begin.
- Forced marriage is an abuse of human rights and, where a child is involved, an abuse of the rights of the child. It is also a criminal offence in this country. Forced marriage involving anyone under the age of 18 constitutes a form of child abuse. A child who is forced into marriage is likely to suffer significant harm through physical, sexual or emotional abuse.
- Honour based violence is the term used to describe the abuse committed in the pretext of preserving family or community “honour” and can often have more than one perpetrator. This kind of abuse can have additional risk factors for the school and must be reported to the DSL or DDSL as soon as possible.

Information on how and when to make a report can be found at: <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

## 4.6 Radicalisation

Radicalisation is a form of harm or abuse of vulnerable people, sometimes children. It is aimed at inciting or promoting extremist ideas so that the child comes to support or be involved in extremist ideologies which may lead to terrorism. Appendix G contains full definitions and a list of indicating behaviours. DSLs and DDSLs will receive biannual training on Prevent and deliver this to school staff in CPD. All staff at Talbot House will:

- Where staff are concerned that children and young people are developing extremist views or showing signs of becoming radicalised, inform a DSL or DDSL.
- Protect children from the risk of radicalisation as part of the school’s wider safeguarding duties.
- Actively assess the risk of pupils being drawn into terrorism.
- Understand that as part of the Counter Terrorism and Security Act 2015, we have a duty to ‘prevent people being drawn into terrorism’.
- Use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.
- Be alert to changes in pupils’ behaviour which could indicate that they may be in need of help or protection.
- Use their professional judgement to identify pupils who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme through CSCS.
- A child who moves school and has been involved with the Channel programme will have that information shared with the new school so they may support them moving forward.
- The DSL/DDSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel Programme, in the first instance.

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- Staff who identify any indicators as described in Appendix G, will immediately refer to a DSL or DDSL
- Ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms (unless doing so will place a child at risk of harm).
- Building children's resilience, the school will:
  - Provide a safe environment for debating controversial issues.
  - Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development.
  - Allow pupils time to explore sensitive and controversial issues.
  - Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
  - Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
  - Teach pupils about how democracy, government and law making/enforcement occur.
  - Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

## 4.7 Domestic Abuse

Domestic Abuse is any single incident or pattern of incidents. The abuse can be, but is not limited to psychological, sexual, financial, or emotional and can be between those who are or have been intimate partners or family members. See appendix A for a full definition. Staff will be aware that:

- Children who are exposed to or witnessing domestic abuse or violence, even if the violence isn't happening to them, are being subjected to abuse.
- Children may witness domestic abuse directly, but they can also experience it indirectly by:
  - Hearing the abuse from another room
  - Seeing a parent's injuries or distress afterwards
  - Finding disarray like broken furniture
  - Being hurt from being nearby or trying to stop the abuse
  - Experiencing a reduced quality in parenting because of the abuse (Royal College of General Practitioners and NSPCC, 2014; Holt, Buckley and Whelan, 2008).
- Domestic abuse happens between partners, ex-partners, family members, carers (any personally connected person) and in the context of their home life.
- Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. School will collaborate with appropriate services where a child has been identified as requiring support.
- A child may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

See the impact of domestic abuse on children here:

<https://learning.nspcc.org.uk/child-abuse-and-neglect/domestic-abuse#heading-top>

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## 4.8 Neglect

The persistent failure to meet a child's basic physical and or psychological needs, is likely to result in the serious impairment of the child's health or development. All staff will:

- Be aware of the forms of neglect a child may be subjected to and be mindful not to measure by the most recent set of events but should be judged by the cumulative impact on the child over time. It is important to avoid "start again" syndrome (neglect is repeated, persistent behaviour of failing to meet needs).
- Understand that neglect differs from other forms of abuse in that there is rarely a single incident or crisis. No set pattern of events indicates that neglect is taking place, other than that the child's basic needs are not adequately met.
- In assessing this staff should bear in mind that basic needs include:
  - The need for food, shelter, clothing, warmth, safety, stimulation, protection, nurture, medical care, education, identity and play.
  - Adequately means sufficient to avoid harm or significant harm.
  - Failure to meet need does not always mean that the parent/carers are intentionally neglectful, but it points to the need for intervention.
  - It is essential to monitor the impact of intervention and ensure challenge where required.
- Be alert to the essential factors in demonstrating that a child is being neglected:
  - The child is suffering or is likely to suffer, significant harm which arises because of the failure of parents or carers to meet the child's needs.
  - Over time, the harm or risk of harm has become worse or has not improved.
- Be mindful of signs of an environment of low warmth and high criticism – that is, parents/carers who switch unpredictably between helpless (neglectful) and hostile (abusive) care.
- Ensure accurate detailed and contemporaneous recording and sharing of information. Records should be factual, evidenced, dated, and timed and professional opinion clearly stated.
- Remember that neglect can be fatal to a child, staff must treat neglect the same as any other form of abuse.

## 5. Concerns about a Pupil

Staff must maintain an attitude of "it could happen here" where safeguarding is concerned and always act in the best interests of the child. This section discusses what to do if staff have a concern that a child may be showing any or some of the indicators mentioned above in section 4.

### 5.1 Procedures

Staff members who have concerns about the safety or welfare of a pupil will;

- Act immediately by speaking to a DSL or DDSL (identified in posters displayed) who will then decide whether to invoke Early Help or refer to statutory services.
- Be aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing and the seven golden rules of information sharing (see section 12).
- Understand contextual safeguarding and children's experiences of significant harm beyond their families and homes. The different relationships that young people form in their community, schools and online can feature violence and abuse. School staff, particularly the DSL and DDSL, will always consider the context of incidents which occur when assessing risk of harm. The school will provide as much contextual information as possible when making referrals to CSCS.



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- Care team members and other school staff remain in close contact with parents (often daily) and carers allowing us to gain a good level of contextual insight.
- Staff should remember that interfamilial abuse remains the greatest risk of abuse to children.
- Where a child has a social worker already, they should be informed of the concerns.
- Record the details onto CPOMS as soon as possible (within one day, ideally the same day).
- Regular CPD will take place so staff understand how to record correctly.
- Where a DSL or DDSL is not available on site, contact them via telephone immediately, this should not delay any action to safeguard the child.
- If a referral to CSCS is made about a child by anyone other than the DSL or DDSL, inform a DSL or DDSL as soon as possible.
- Take direction from CSCS about whether parents should be informed about the referral.
- Expect that CSCS will make a decision regarding what action is required within one working day. Chase up a response, escalating the concern through management channels until a satisfactory response is given.
- If the situation does not improve for the child, the DSL or DDSL will ask CSCS to reconsider the referral. Staff should remember to monitor the impact of the action taken or recommended by the CSCS so that the situation improves.
- Where early help is appropriate, the case will remain under regular review in order to ensure improvements occur in a timely manner.
- Report a pupil who is in immediate danger or has committed a crime (e.g. sex violence), to the police and refer to the CSCS immediately.
- Consider the wishes of pupils (without the promise to keep a secret) when there is a disclosure and there are systems in place for pupils to provide feedback and express their views.
- If Early Help is appropriate, a member of staff (DSL, DDSL or member of the care team) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help assessment, in some cases acting as the lead practitioner. Early Help cases will remain under review and referred to CSCS for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.
- DSLs and DDSLs should refer to KCSIE 21 paragraphs 62 to 70 to determine what to expect from a referral to statutory services. Local arrangements may also differ slightly and can be sought from the LA when making the referral. Threshold information should also be sought.



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## Actions where there are concerns about a child



All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSLs or DDSLs if they have concerns about a child. Staff should determine how best to build trusted relationships with children and young people which facilitate communication.

## 6. Concerns about a Staff Member's Actions or Inactions

From time to time members of staff may feel unhappy or uncomfortable with the way a colleague has behaved with a child. As part of our whole school approach, we promote an open and transparent culture where all concerns about adults are listened to and dealt with promptly. They may arise within two main categories:

- An allegation as described in point 6.2 below where the threshold of harm has been met (and therefore handled within the terms of the **Allegation Policy**).
- Low level concerns – where the threshold of harm has not been met as described in paragraph 338 of KCSIE 22, but there is still a concern.

### 6.1 Low level concerns

The school will ensure that a culture of responsibility exists with all adults working with our children, to enable them to report concerns they may have no matter how small, even if it is no more than a feeling of unease or a nagging doubt. Although our school thrives on good relationships between children and staff, all staff are expected to observe professional boundaries in order to minimise the risk of abuse.

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- These concerns may not meet the harm test as described below in 6.2 and may not require a report to the Local Authority Designated Office (LADO), nevertheless they may arise from:
  - Suspicion, complaint from others or disclosures from children.
  - Inappropriate behaviour or interactions with children (e.g. overfamiliar).
  - Behaviour inconsistent with the code of conduct (including outside of work).
  - Showing favouritism.
  - Taking photos of children on personal devices not related to learning evidence.
  - Children being one to one with staff in a secluded situation (this could be in full view of others or behind a locked door);
  - Using inappropriate sexualised, intimidating or offensive language.
- It is important that concerns of this nature are reported to a DSL or DDSL and recorded straight away (this may include HR records).
  - Anyone wishing to remain anonymous in the report of their concern should be allowed to do so if reasonably possible.
  - Records must be kept confidentially and should be reviewed regularly in order to establish if any pattern exists and also to determine if wider cultural issues exist which have enabled the behaviour, with additional training being offered if this is found to be the case.
  - Witnesses should be addressed if they exist.
- Low level concerns which are shared about supply staff and contractors should be notified to their employees, so that any potential patterns of inappropriate behaviour can be identified.
- If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.
- Staff should be aware that such behaviour may be innocent or not have any malicious intent, however, could also be designed to enable abuse later on.
- It is crucial that any such concerns are shared and acted upon appropriately as such actions could also protect adults from false allegations or misunderstandings.
- It is important to create an environment where staff are encouraged to self-refer, for example, if they have found themselves in a situation misinterpreted, might appear compromising to others, and/or on reflection, they believe they have behaved in such a way that they consider falls below the standard.

## 6.2 Allegations of harm

When an allegation is made against a member of staff, including supply staff, governors, volunteers, contractors and agency staff, formal procedures must be followed as detailed within the **Allegations Policy**. A child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to pupils and we must act on every allegation with a full and fair investigation. If a staff member has concerns about another member of staff, volunteer or supply staff, they will inform a DSL or DDSL who is more senior to the subject of the allegation. For example: If the concern is with regards to the Head Teacher, it will be referred to the Chief Executive, Deputy Chief Executive or Chair of Governors and Trustees. If the concern is in regard to the CEO, the staff member will refer it to the Chair of Governors and Trustees.

## 6.3 Learning lessons

Throughout the process in handling allegations and at the conclusion of a case in which an allegation is sustained, the LADO should review the circumstances of the case with the

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case manager to determine whether there are any improvements to be made to the schools procedure to help prevent similar events in the future. This should include issues arising from:

- Any decision to suspend the member of staff.
- The duration of the suspension.
- Whether or not the suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, where the allegation concluded to be either, unfolded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if improvements can be made.

## 7. Concerns about General Safeguarding Practice within School

Any concerns regarding the safeguarding practices at the school must be reported to the SMT as soon as possible. Further to this, staff will:

- Expect their concerns to be taken seriously.
- Have their concerns addressed within the terms of the **Whistleblowing Policy**.
- Where an employee feels unable to raise a concern directly to the SMT or feels that their genuine concerns are not being addressed, other channels are open to them. They can:

- Raise the concerns with the board of Governors and Trustees
- Raise the concern with the NSPCC via their website or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 8. Child-on-Child Abuse

Some children abuse other children, when this happens, it is referred to as child-on-child abuse. Cases of child-on-child abuse will be addressed with the same rigour as the other types of abuse mentioned here. It can happen between children of a similar age or stage of development and between any number of children, affecting any age group. It can be harmful to the children who display it, as well as those who experience it. Although we have an extremely high staff to child ratio here at Talbot House, and relationships between the children are regarded more closely than may be possible in other settings, staff should remain alert to the indicators. This form of abuse can take place in school and out of school and may also be taking place online. The types of abuse are set out in the definition and are available in Appendix G. All staff will be:

- Aware of the indicators of child-on-child abuse.
- Aware of the necessary procedures to follow to prevent child-on-child abuse.
- Expected to understand the process to follow when managing a disclosure.
- Aware that even if there are no reports in the school, it does not mean it is not happening.

### 8.1 A Preventative approach

- In order to prepare pupils for life in modern Britain, prevent child-on-child abuse and address the wider societal factors that can encourage such behaviour, the school will educate pupils about abuse, its forms and the importance of discussing any concerns through the curriculum, assemblies and Personal, Social, Health and Economic (PSHE) lessons. Pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, Relationships and Sex

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Education (RSE) and group sessions. Such content will be age and stage of development specific, and promote the following:

- Healthy relationships
  - Respectful behaviour
  - Boundaries & consent
  - Gender roles, stereotyping and equality
  - Body confidence and self-esteem
  - Non prejudiced behaviour
  - The concept of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, and so called 'honour'-based violence such as forced marriage and FGM.
  - That sexual violence and sexual harassment is always wrong
  - Addressing cultures of sexual harassment
  - A zero-tolerance approach and immediate response to all concerns.
- Pupils will have an open forum to talk about concerns about their friends or peers, and how a report will be handled. Staff are expected to model appropriate behaviour towards others and promote a culture of respect and equality throughout.
  - Our high staff to children ratio is another factor which reduces the opportunity for child-on-child abuse within our setting.
  - Social enrichment curriculum activities will remain an important part of the school day promoting healthy relationships.

8.2 All staff will be aware of the following key information:

- Pupils of any age and sex are capable of abusing their peers. We will never tolerate abuse as “banter,” “just for a laugh,” “boys being boys” or “part of growing up,” as we are aware that this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- Abuse can occur online and face to face, including sexual violence and sexual harassment.
- Even if there are no reports of child-on-child abuse, staff should understand that this does not mean it is not happening. Staff should be vigilant and report any concerns to a DSL or DDSL.
- It is more likely that girls are the victims and boys the perpetrators of such abuse.
- Heightened vulnerability of pupils with SEND.
- LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children. It is important for children who may be LGBTQ+ to have a trusted adult who they can open up with.
- Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach, but the school will report it and the DSL or DDSL will liaise closely with the local police on action to be taken.
- Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- Online concerns can be especially complicated and may or may not be sexual in nature. The school recognises that there is a potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become

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marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

- The school's response to same sex sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.

## 8.3 Procedures

When a report of child-on-child abuse is made, these procedures should be followed:

- Children will be made aware of the reporting procedures for peer-on-peer abuse within PSHE lessons and on posters around the building. Child-on-child abuse will not be tolerated and this will be clearly communicated throughout.
- Inappropriate behaviour, even if it appears low level, can be an important intervention which helps prevent potentially problematic and abusive behaviour.
- Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL or DDSL.
- Child-on-child abuse where there has been a crime committed, will be reported to the police only when taking the victim's wishes into consideration.
- If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed. Government guidance on Sharing Nudes and Semi Nudes; advice for education publication from UKCIS will be followed.
- The school will use its powers of searching, screening and confiscation should it feel that a child is at risk of harm from abuse.
- All allegations of abuse will be recorded on CPOMS and reported to a DSL or DDSL immediately.
- Staff will follow the procedure in section 11 to manage a peer-on-peer abuse disclosure.

## 9. Child-on-Child Sexual Violence and Sexual Harassment

Although many of the preventative methods, indicators and procedures are similar to those described in section 8 when dealing with allegations of child-on-child sexual violence or sexual harassment, there are several further considerations when dealing with disclosures of a sexual nature. Disclosures of this nature will follow the process detailed in section 11. In addition to those elements described in section 8 above:

### 9.1 Prevention

As well as the measure discussed in section 8.1, sexual violence and sexual harassment education will also be addressed within the curriculum:

- Relationships Education (for all primary pupils)
- Relationships and Sex Education (for all secondary pupils).
- British values are embedded in the PSHE curriculum (see **PSHE Policy**).

### 9.2 Awareness

Staff will be aware of the additional characteristics of child-on-child sexual violence and harassment:

- This type of abuse typically occurs on a continuum and may overlap.
- Children who are learning about appropriate relationships within lessons may be triggered to disclose.
- Children who are victims of sexual violence and sexual harassment, will likely find the experience stressful and distressing. The experience could adversely affect their educational attainment an especially if the alleged perpetrator attends our school too.



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- Children who have experienced sexual violence may display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. Staff should remain alert to the possible challenges of detecting the signs and show sensitivity to the needs of the child irrespective of how over the child is.
- Children may experience abuse of this nature from peers as part of CSE or CCE.
- Girls are more likely victims than boys, however, we will take all reports seriously no matter the gender of the child involved.
- Technology is a significant component in multiple harms including sexual exploitation, criminal exploitation, sexual abuse, youth violence and county lines. Sexual violence and harassment may be perpetrated as part of these wider factors.
- Online incidents introduce a number of complications; the speed of information, the lack of geographical control, the unlimited audience reach and difficulty in permanent removal.

## 9.3 Procedures

- Victims should never be made to feel ashamed for making a report, they should be supported and protected from further abuse in the most effective way possible.
- The alleged perpetrator may not always be removed from the school setting, but alternative approaches may be considered for the provision of their education.
- The alleged perpetrator will be given the correct level of support to ensure they have the skills required to ensure future episodes do not occur.
- Staff will challenge physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts, genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Rape, assaults by penetration and sexual assaults are crimes. When a report includes such an act, the police will be notified. The DSL or DDSL will be aware of the local process for referrals to CSCS after the police report is made.
- DSLs and DDSLs handling the report should refer to guidance: Sexual Violence and Sexual Harassment between Children in Schools and Colleges. This documentation will inform staff how to progress the report appropriately including:
  - Context – what is consent, power imbalance and developmental stages.
  - Harmful Sexual Behaviour (HSB) and what that might indicate.
  - Support and legal responsibilities advice – both victim and alleged perpetrator.
- Support will be offered to both victim and alleged perpetrator.
- Alleged perpetrators will be removed from shared classrooms and other shared educational activities, without allowing the assumption of guilt.
- School transport providers will also be asked to comply with the separation.
- Any action taken should not impede any criminal or social care investigation, however safeguarding the children involved immediately remains a priority.
- Understand the importance of intra familial harms and offer any necessary support to siblings following an incident.

## 10. Disclosures

This section deals with managing disclosures, save for those which would be managed through the **Allegations Policy** (relating to the staff and other adults not personal to the child). Specifically, disclosures relating to abuse or neglect. There are specific measures for DSLs and DDSLs to take for each kind of disclosure.

### 10.1 Staff hearing a disclosure will adhere to the following:



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- Children often choose to disclose abuse to anyone they feel comfortable with. Each member of staff should feel confident in knowing what to do when that happens.
- We will take all disclosures seriously and the victim will be reassured, supported and kept safe. Staff will take care not to make them feel like they are causing a problem or made to feel ashamed.
- If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it or wait for a direct report. The basic principles remain the same as when a victim reports an incident and staff will always report it to a DSL or DDSL; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively.
- Support will be provided to the child and to those staff hearing the disclosure where required.
- Staff hearing the report should:
  - Remain calm and accept what the child says, believe them.
  - Reassure them that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.
  - Listen actively, without making unnecessary comments about the disclosure or abuser.
  - Ask open questions about whether they have been harmed, by whom and when, without leading them. Do not ask “why”, this is a difficult question to answer. Staff should feel able to question to establish if harm has taken place, without investigating. Use phrases like “Tell me more about that...” or “What else can you remember about it...”
  - Take control of the situation, this lets them know they are safe with you.
  - Do not promise that you will fix or change the situation, you may not be able to.
  - Be patient and prepared for repetition or long pauses, do not attempt to fill the gaps.
  - Use familiar words.
  - Be aware of your own feelings and be mindful of expressions of shock or upset.
  - Direct eye contact can be very intense for children, if so try to sit adjacent.
  - Tell them that they have not done anything wrong.
  - Tell them what to do next.
  - Bear in mind that false allegations of sexual abuse are rare.
  - Seek someone to discuss your own feelings with once the disclosure is over.
  - Explain to them that the law is in place to protect them rather than criminalise them.
- All staff will be trained to handle disclosures. Effective safeguarding practice includes:
  - Never promising not to share the concern.
  - Only sharing the report with those necessary for its progression.
  - Explaining to the victim what the next steps will be and who the report will be passed to remaining clear about boundaries.
  - Recognising that the person the child chose to disclose the information to is in a position of trust.
  - Not asking leading questions and only prompting the child with open questions.
  - Waiting until the end of the disclosure to immediately record a thorough summary on CPOMS. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted. Recording the disclosure on CPOMS should only take place once a DSL or DDSL has been informed verbally.
  - If written notes are taken, they must be kept, scanned into the CPOMS entry, and passed to the DSL or DDSL.

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- Even if a child retracts a disclosure, it must still be reported.
- Only recording the facts as the child presents them – not the opinion of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCIS advice ensuring that staff never view illegal content.
- Wherever possible, manage disclosures with two staff members present (preferably with a DSL or a DDSL as one of the staff members).
- Informing the DSL or DDSL as soon as possible after the disclosure if they could not be involved in the disclosure.
- The police, social workers or other external individuals may need to speak to the victim to hear the disclosure or ask questions. In this case, school staff will offer to support the child through this process. This applies to victims and alleged perpetrators, where they are also a child in our school.
- All staff have the right to report the disclosure to CSCS, LADO or the police, if they feel the action taken by the DSL or DDSL is not sufficient, taken quickly enough or they are in any way dissatisfied with the proposed action.
- Staff are also expected to follow up with the DSL or DDSL, any disclosure made to them and satisfy themselves that the appropriate action has been taken to be able to resolve the issue for the child.

## 10.2 DSL/DDSL actions to manage a disclosure of abuse or neglect

A DSL or DDSL receiving a disclosure will manage it as detailed here. Where a child discloses possible neglect or abuse, a report will be made to CSCS as soon as possible. Where a crime is alleged, the police will also be informed.

### 10.2.1 Referral to CSCS

- If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to CSCS. All referrals should be made immediately.
- The DSL or DDSL will follow the procedures for referral specific to the LA who places the child.
- Parents will only be informed with the agreement of social care, but not if it will place the victim at risk or potentially damage any investigation. This decision will be made in consultation with CSCS.
- If the DSL or DDSL suspects the child is at risk of harm upon leaving the premises, the child will not be allowed to go home until the police and CSCS have been consulted.
- The school will not wait for the outcome of an investigation before protecting the victim and other children.
- The DSL/DDSL will work closely with CSCS to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.
- If the CSCS decide that a statutory investigation is not appropriate and the DSL/DDSL disagrees, the school will consider referring the incident through professional challenge and escalate it.
- If they believe the child to be in immediate danger or at risk of harm, the police will be informed.
- CSCS and other professionals should agree on a way forward, this should be the best solution to ensure the safety of the child. Not all referrals will mean that social care becomes involved with the family, but it is important to ensure that referrals

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continue to be made to social care so that a full picture is allowed to build up over time.

- When reporting to CSCS, the DSL or DDSL must give a full picture of events where they form an evidential basis for reporting. It is very rare that children report neglect or abuse directly and as soon as it happens as it is likely that other factors may impact on that. Their abuser may have threatened them, or they may feel that what is happening is normal or they may have communication difficulties. Rather than a very clear sign of abuse, more often, information is collated over time. The full picture needs to be reported and should include professional opinion described as such.
- Once a report is made, CSCS will determine the next steps and they may include Early Help, referral to specialist services, a CIN assessment (Section 17) or a CP Enquiry (Section 47), which may lead to a CP plan.
- One or more DSLs or DDSLs will be assigned to Early Help, CIN and CP cases and will be proactive members of the CP team, seeking to achieve a change in circumstances for the child which leads to them being subjected to a CP plan. DSLs and DDSLs must advocate for the child and ensure that any plan in place is effective with specific, measurable, achievable and timely targets.

## 10.2.2 Reporting to the police

- Any criminal act such as reports of rape, child abuse, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with a referral to CSCS. The DSL and DDSL will follow the local process for referral.
- Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.
- The DSL or DDSL will agree on what information will be disclosed to staff and others. They will be aware of local arrangements and specialist units that investigate child abuse.
- In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required and must not take this as an indication that the child was lying or that the incident did not take place.

## 11. Child-on-Child Abuse Disclosures

Specific duties exist for dealing with disclosures relating to child-on-child abuse. The measures set out in this section (including 10.1 to 10.4) should be taken, as well as the elements detailed here. The following points all relate to this form of abuse.

- 11.1 Staff hearing a disclosure of peer-on-peer abuse or child-on-child sexual harassment or sexual violence, will follow the guidance set out in 10.1. The DSL or DDSL will also consider the following:
- The victim's wishes
  - The nature of the incident
  - The ages and development stages of the children involved
  - Any power imbalance between the children
  - Whether this is an indicator of factors in a child's life that threaten their safety or welfare (CSE, CCE or other exploitation)
  - Risks to the other children or adults

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- The best interests of the child or children
- How to support the victim
- Supporting the perpetrator.

## 11.2 Risk assessment

The DSL or DDSL will make an immediate risk and needs assessment any time there is a requirement resulting from a disclosure of any kind. Risk assessments are not intended to replace the detailed assessments of experts, and for some incidents (sexual violence, sexually harmful behaviour), it is likely that a professional risk assessment by a social worker or specialist will be required.

- Risk assessments will consider:
  - The victim and whether there could be further potential victims.
  - The alleged perpetrator and their need for education.
  - Other children at the school and their safety.
  - If a professional risk assessment has been completed by social workers or other involved parties.
  - The content of this document.
- Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's **Data Protection (GDPR) Policy**.
- In some cases (sexual violence, sexual harassment or other serious abuse), whilst professionals investigate, the alleged perpetrator may be removed from any activity shared with the victim and may be temporarily educated elsewhere. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgment of guilt on the perpetrator.

## 11.3 Managing the report

- The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.
- There are four likely outcomes when managing reports of sexual violence or sexual harassment:
  - Managing internally – in some cases, e.g. one-off incidents, the school may decide to handle the incident internally through **behaviour and bullying policies** and by providing pastoral support.
  - Providing early help – the school may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.
  - Referring to CSCS – see section 10.3.
  - Reporting to the police – see section 10.4.
- Whatever outcome is determined, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons behind decisions will be recorded either on paper or electronically.
- The following situations are statutorily clear and do not allow for contrary decisions:
  - A child under the age of 13 can never consent to sexual activity.
  - The age of consent is 16.
  - Sexual intercourse without consent is rape.
  - Rape, assault by penetration and sexual assaults are defined in law.

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- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

## 11.4 Ongoing support from the victim

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

## 11.5 Bail conditions for alleged perpetrators

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

## 11.6 Managing delays in the criminal justice system

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

## 11.7 The end of the criminal process

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



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

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

## 12. Communication and Confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with the **Data Protection (GDPR) Policy**. The seven golden rules to sharing information will be followed and can be found here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

When managing information, safeguarding must come first and an individual's right to data should not impede that.

### 12.1 Confidentiality

The school will only engage staff and agencies required to support the victim or be involved in any investigation. Victims often ask that the disclosure is not passed onto anyone, we will explain that this cannot be compromised. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm or assists in the prevention, detection, or prosecution of a serious crime.

- The DSL or DDSL will consider the following when making confidentiality decisions:
  - Parents will be informed unless it may place the victim at greater risk (e.g. the perpetrator is a parent).
  - If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made to the police and CSCS.
  - Reports containing any crime or potential crime will be passed to the police.
- The DSL or DDSL will weigh the victim's wishes against their duty to protect all concerned. If a referral is made against the victim's wishes, it will be after careful consideration and the reasons for the referral will be explained to the victim. Appropriate specialist support will always be offered.
- Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members with external agencies on a need-to-know basis.
- Where a pupil is leaving the school, the DSL or DDSL will consider whether it is appropriate to share information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.
- Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches prevented.

### 12.2 Anonymity

Where there is an allegation or incident of sexual abuse, sexual violence or sexual harassment, or the case is progressing through the criminal justice system, the victim is



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entitled to anonymity by law; therefore, the DSLs or DDSLs will consult and agree to what information will be disclosed to staff and others, in particular, the alleged perpetrator and their parents (if applicable).

## 12.3 Child-on-child confidentiality

There are specific issues to consider where the alleged perpetrator of sexual violence or sexual harassment is a child in our school.

- Discussion with the victim's parents will relate to the arrangements to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression report. No discussion about the identity of the alleged perpetrators will take place.
- Discussion with the alleged perpetrator's parents will regard the arrangements that will impact their child, such as moving classes, with the reasons behind the decision being explained and the available support discussed.
- External agencies will be invited to these discussions where necessary.

## 13. Online Safety

It is extremely important that children are kept safe from potentially harmful and inappropriate online material. Talbot House Children's Charity will have a whole school approach to dealing with pupil safety online, with a remit to protect and educate pupils, students and staff in their use of technology and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

### 13.1 Awareness

There are four main areas of risk for staff to be aware of:

- Context: exposure to illegal, inappropriate or harmful content, including; pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: peer-on-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal or financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Communication with parents and carers should continue to reinforce the importance of children being safe online. It is especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear about who, if anyone, their child is going to be interacting with online.

### 13.2 Prevention

We will consider online safety in all aspects of school life. The internet is embedded in our world and while there is no way to protect children from everything harmful online, the school will do everything in its power to ensure a good level of security exists, as well as information and education for children so that they know how to remain safe online.

- The Charity will invest in suitable filtering, monitoring and security systems to apply appropriate filtering to web searches ensuring that material which is harmful to children is blocked, without unreasonably impacting teaching and learning.

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- The Charity will identify and assign roles and responsibilities to manage filtering and monitoring systems, and make sure that these systems are reviewed at least annually.
- The school will ensure that suitable filtering systems are in place to prevent children from accessing terrorist and extremist material.
- Inappropriate content search attempts will be logged.
- Children will hand in mobile devices while at school and have them returned to them before home.
- Visitors will be asked to leave mobile devices out of sight while in school unless pre-arranged.
- As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.
- Through training, all staff members will be made aware of the following:
  - Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
  - The procedure to follow when they have a concern regarding a pupil's online activity.
- The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what pupils are able to be taught.
- Further information regarding the school's approach to online safety can be found in the **Online Safety Policy**.

## 14. Pupils at risk of serious violent crime or organised crime

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime or organised crime gangs.

- All staff should be aware of the associated risks and understand the measures in place to manage them. Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime or gang membership. These indicators include, but are not limited to, the following:
  - Increased absence from school
  - A change in friendships
  - New relationships with older individuals or groups
  - A significant change in wellbeing
  - Signs of assault
  - Unexpected injuries
  - Unexplained gifts or new possessions.
- Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violent crime. These risk factors include, but are not limited to, the following:
  - A history of committing offences
  - Vulnerability due to SEND
  - Domestic violence
  - Parental neglect
  - Being male
  - Substance abuse
  - Anti-social behaviour
  - Truancy
  - Parental substance abuse
  - Parental criminal history
  - Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL or DDSL.

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## 15. A Child Missing from Education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation. This falls into two categories, a child missing in education, and a child absconding from school.

### 15.1 Children who abscond

- Staff will monitor pupils who go missing from school, particularly on repeat occasions, and report them to the DSL or DDSL following normal safeguarding procedures, in accordance with our **Absconding Policy**.
- Knowing where children are during school hours is an extremely important aspect of safeguarding; it is our policy for all children to be in view of an adult during school hours.
- Going missing from school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

### 15.2 Children missing in education with poor attendance

It is usual that all of our children travel in via taxi or parent/carer vehicle; therefore, children who do not arrive at school are unlikely to be late or truanting. For this reason in our setting, particular attention will be paid to those children who do not turn up to school and whose parents or carers cannot be reached. The school has a responsibility to ensure safeguarding of the pupils on its roll during the school day. Adults who work with children are expected to take an in loco parentis approach (in place of the parent).

- We monitor attendance carefully and address poor or irregular attendance without delay, and follow procedures detailed within the **Registration and Attendance Policy**.
- We require at least two up-to-date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.
- We will always follow up with parents/carers when pupils are not at school according to the details within the **Registration and Attendance Policy** (within a timeframe after registration is closed, usually an hour).
- The missing children protocol (within **Absconding Policy**) may be activated if no resolution is found, which may include staff visiting the child's home, or the involvement of outside agencies.

In response to the guidance in **Keeping Children Safe in Education** (latest version), the school has:

- Staff who understand what to do when children do not attend regularly.
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Staff who are aware of the context around the child in relation to possible exploitation.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - Leave school to be home educated
  - Move away from the school's location
  - Remain medically unfit beyond compulsory school age

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- Are in custody for four months or more (and will not return to school afterwards) or
- Are permanently excluded.
- We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date and forward all specific data to them.

## 16. Attendance

Good attendance not only secures a good level of education for a child but allows for well-informed safeguarding information to be maintained. There are a number of policies within the Charity, which set out our expectations for attendance at school.

Related policies:

- **Admissions and Discharge Policy**
- **Absconding Policy**
- **Registration and Attendance Policy**

### 16.1 Recording attendance (Registration)

- Registration information will be collected and held within SIMS, with absences also being reported within CPOMS along with safeguarding concerns and incidents.
- The school will ensure that the attendance register is kept up-to-date and accurate at all times, within the parameters set out in the policy.
- Offsite registers will be completed when children leave site to complete social enrichment curriculum tasks.
- Attendance figures will be reported at EHCP, PEP and LAC review meetings.
- If a pupil moves to a new school, the school will securely transfer pupils' data.
- Children with social services involvement may also have attendance reported to allocated workers.

## 17. Pupils with SEND

Children with additional needs including children with Special Educational Needs and Disabilities (SEND), can be particularly vulnerable to safeguarding risks. All of the children who attend our school have special educational needs (most with EHCPs). Staff will recognise that:

- Pupils with SEND can face additional safeguarding challenges and understand that further barriers may exist when determining abuse and neglect in this group of pupils. (See **SEND Policy**)
- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability; however, it should never be assumed that indicators relate only to their disability without further exploration.
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs.
- Communication barriers may exist, as well as difficulties in overcoming these barriers. Disclosures should be heard with due regard to the setting, support, strategies and SEND profile of the child.
- Support for external agencies (police, social care) should be offered so that the child feels comfortable enough to make those disclosures.

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- Pupils with SEND may need additional support with cognitive understanding such as being able to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or the consequences of doing so.

## 18. Pupils who are Vulnerable

Staff should consider who may be particularly vulnerable to abuse and may require early help. At Talbot House we recognise that certain factors can increase vulnerabilities, including:

- Children facing housing issues such as frequent moves and homelessness.
- Those living in families with chaotic lifestyles.
- Families with increased stress, parental mental health and/or drug and alcohol dependency.
- Those children living elsewhere, with friends, relatives, are in care or leaving care.
- Asylum seekers/refugees.
- Those vulnerable to discrimination on the basis of their sexuality, race, religion, ethnicity or disability.
- Children at risk from neglect or abuse including specific issues such as FGM, CSE, forced marriage, radicalisation and living in households with domestic abuse.
- Children with communication difficulties.
- Children without adequate parenting supervision which could lead to abuse, risk-related behaviour and exploitation.

This is not an exhaustive list but merely an example of vulnerabilities that staff must consider when identifying safeguarding concerns.

## 19. Alternative Provision

From time to time and with the agreement of the local authority commissioning the placement, a pupil may access training or skills provisions outside of our school. This may be on a full or partial timetable. This arrangement will bring new safeguarding considerations with it. The school will remain responsible for a pupil's welfare during their time at an alternative provider.

19.1 If this situation arises the following will take place prior to the commencement date:

- Agreement of the placing authority will be sought.
- An assessment of the placement and its suitability for the child's educational requirements.
- Review of the placement's own policies including safeguarding and behaviour.
- Review the placement's risk assessment and pupil expectation documentation.
- Ensure the suitability of the locality by visiting the premises.
- Determine the mix of other pupils and associated peer risk potential.
- Complete a risk assessment for the individual.
- Determine a monitoring schedule and procedure to enable us to carry out ongoing risk assessments and monitor progress throughout the duration of the placement.

## 20. Pupils with Family Members in Prison

Pupils in this category will be offered pastoral support as necessary. They will receive a copy of 'Are you a Young Person with a Family Member in prison' from Action for Prisoners' where appropriate and allowed the opportunity to discuss questions and concerns.

## 21. Pupils Required to Give Evidence in Court

These pupils, whether for crimes committed against them or crimes they have witnessed, will be offered pastoral support and offered chaperoning services if appropriate.

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- Pupils will also be provided with the booklet 'Going to Court' from HM Courts and Tribunal Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.
- Pupils will also be provided with the booklet 'Going to Court and Being a Witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

## 22. Homelessness

A child's wellbeing is severely affected by becoming homeless or being at risk of homelessness.

- 22.1 The DSLs and DDSLs will be aware of the contact details and referral routes into the specific Local Housing Authority so that concerns over homelessness can be raised as early as possible by them.
- Indicators that a family may be at risk of homelessness include the following:
    - Household debt
    - Rent arrears
    - Domestic abuse
    - Anti-social behaviour
    - Any mention of a family moving home because "they have to".
  - Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm or neglect.
  - For 16 and 17 year olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

## 23. Safer Recruitment, Pre-employment Checks and Single Central Record

The Charity has a separate policy, which details the measures we take before employing new members of staff, known as the **Safer Recruitment Policy**. The Charity is committed to diligently adhering to the terms of this policy in order to ensure that every effort is made to employ staff who do not pose a risk of harm to children. The **Single Central Record Policy** details the procedures we follow to maintain a list of adults working with our children, and the statutory information we hold on them for this purpose. These policies discuss how we maintain Disclosure and Barring Service checking and other pre-employment checks.

## 24. Training

The Charity is committed to an ongoing programme of staff training. Both in-house and external training will be timetabled for all staff.

- 24.1 Staff members will undergo safeguarding training at induction. The induction process will cover:
- This **Child Protection and Safeguarding Policy**
  - **The Behaviour Policy**
  - **Online Safety Policy**
  - The Staff Code of Conduct
  - The **Absconding Policy**
  - The **Allegations Policy**
  - The identity of the DSLs and DDSLs
  - The role of the DSLs and DDSLs
  - **KCSIE (2021) and Working Together to Safeguard Children**



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## 24.2 Ongoing

- All staff members will also receive regular safeguarding and child protection updates as required, but at least termly through Continuous Professional Development (CPD).
- During CPD staff should feel able to contribute to the safeguarding arrangements within the school, using their experience and knowledge of the children gained while working daily with them.
- Particular attention should be paid to the changing landscape of online safety in training programmes about safeguarding and should also be built into the curriculum planning for children.
- The DSLs and DDSLs will undergo updated safeguarding training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (termly) to allow them to keep up-to-date with any developments relevant to their role and the local area.
- The DSLs and DDSLs will also undergo Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff.

## 24.3 External Partnerships

The Charity will maintain relationships with members of the North and South of Tyne Safeguarding Children Partnership. From time to time, we will invite members of the partnership in to share information on prevalent issues in the region and update staff on procedures.

## 25. Monitoring and Review

This policy is reviewed annually by the Safeguarding Team (DSLs and DDSLs). Any changes made to this policy will be communicated to all members of staff following its update. The next scheduled review date for this policy will be September 2024.

# Child Protection and Safeguarding Policy

## Definitions

### Appendix A – Glossary of General Terms

Item	Definition
<b>Children</b>	Anyone who has not yet reached their 18 <sup>th</sup> birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlement to services or protection.
<b>Child Protection</b>	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
<b>Young Carer</b>	A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).
<b>Parent Carer</b>	A person aged 18 or over who provides or intends to provide care for a disabled child for whom the person has parental responsibility.
<b>Education, Health and Care Plan (EHCP)</b>	A single plan, which covers the education, health and social care needs of a child or young person with special educational needs and/or a disability (SEND). See the Special Educational Needs and Disability Code of Practice 0-25 (2014).
<b>Local Authority Designated Officer (LADO)</b>	County level and unitary local authorities should ensure that allegations against people who work with children are not dealt with in isolation. Any action necessary to address corresponding welfare concerns in relation to the child or children involved should be taken without delay and in a coordinated manner. Local authorities should, in addition, have designated a particular officer, or team of officers (either as part of a multi-agency arrangements or otherwise), to be involved in the management and oversight of allegations against people who work with children. Any such officer, or team of officers, should be sufficiently qualified and experienced to be able to fulfil this role effectively, for example, qualified social workers. Any new appointments to such a role, other than current or former designated officers moving between local authorities, should be qualified social workers. Arrangements should be put in place to ensure that any allegations about those who work with children are passed to the designated officer, or team of officers, without delay.
<b>Safeguarding Partners</b>	A safeguarding partner in relation to a local authority area in England is defined under the Children Act 2004 as: (a) the local authority, (b) a clinical commissioning group for an area any part of which falls within the local authority area, and (c) the chief officer of police for an area any part of which falls within the local authority area. The three safeguarding partners should agree on ways to co-ordinate their safeguarding services; act as a strategic leadership group in supporting and engaging others; and implement local and national learning including from serious child safeguarding incidents. To fulfil this role, the safeguarding partners must set out how they will work together and with any relevant agencies as well as arrangements for conducting local reviews.
<b>County Lines</b>	As set out in the Serious Violence Strategy, published by the Home Office, a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money,

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	and they will often use coercion, intimidation, violence (including sexual violence) and weapons.
<b>Domestic Abuse</b>	<p>Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence. Anyone over the age of 16 can be a victim or perpetrator of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside a home. Domestic abuse continues to be a prevalent risk factor identified through children social care assessments for children in need. Domestic abuse has a significant impact on children and young people. Children may experience domestic abuse directly, as victims in their own right, or indirectly due to the impact the abuse has on others such as the non-abusive parent. More information can be found in the Domestic Abuse Act 2021 Guidance, including the new statutory definition of domestic abuse. Domestic abuse can include:</p> <ul style="list-style-type: none"> <li>• Sexual abuse and rape (within a relationship).</li> <li>• Intimate partner violence.</li> <li>• Punching, kicking, cutting, hitting with an object.</li> <li>• Withholding money or preventing someone from earning money.</li> <li>• Taking control over aspects of someone's everyday life, which can include where they go and what they wear.</li> <li>• Not letting someone leave the house.</li> <li>• Reading emails, text messages or letters.</li> <li>• Threatening to kill or harm them, a partner, another family member or pet.</li> </ul>
<b>Controlling or coercive behaviour</b>	<p>Also known as coercive control, the use of control and coercion in relationships is a form of domestic abuse and, since December 2015, a criminal offence. Controlling and coercive behaviour is outlined in Government guidance issued under section 77 of the Serious Crime Act 2015 as part of the Government's non-statutory definition of domestic violence and abuse. It is described as:</p> <p>Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour; and</p> <p>Coercive behaviour is: an act or pattern of acts of assault threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Coercive control is a form of abuse which involves multiple behaviours and tactics which reinforce each other and are used to isolate, manipulate and regulate the victim. This pattern of abuse creates high levels of anxiety and fear.</p>

## Appendix B- Categories of Abuse Definitions

The categories of abused is described within North and South of Tyne Safeguarding Children Partnership Procedures Manual, the NSPCC **Working Together to Safeguard Children and Keeping Children Safe in Education**.

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## 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. It can be physical, sexual, or emotional but can also involve neglect. 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 by another child or children.

## Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing deliberate physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. It also includes injuries such as bruises, broken bones, burns or cuts. Breast ironing or breast flattening is a practice of using hard or heated objects to suppress or reverse the development of breasts, it is also a recognised form of physical abuse (see Appendix C). Physical abuse can lead to neurological damage, injuries, disability or death. Harm may be caused to children both by the abuse itself and through the emotional experience of abuse taking place. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural difficulties and poor educational achievement. Physical abuse of children often coexists with domestic violence. Physical abuse, as an adverse childhood experience, can have a negative effect on the development of children's brains, potentially impacting their mental and physical capacities in later life.

"The effect of physical abuse on a child's developing brain can lead to an overactive stress response, impaired cognitive development and weakened executive function skills." (Shonkoff et al, 2008; Shonkoff et al, 2014).

## Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing 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, although it may occur alone.

There is evidence that there are long-term adverse consequences for children's development where there is sustained emotional abuse. Emotional abuse has a significant impact on a developing child's mental health, behaviour, and self-esteem. Domestic violence, adult mental health problems and parental substance misuse may be features of family life where children are exposed to emotional abuse.

## Sexual abuse

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

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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 is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

## Child sexual exploitation

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 either in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

## Neglect

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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect is characterised by the absence of a relationship of care between the parent/carer and the child and the failure of the parent/carer to prioritise the needs of their child. It can occur at any stage of childhood, including the teenage years. Further information on neglect can be found here:

[www.proceduresonline.com/nesubregion/p\\_neglect.html](http://www.proceduresonline.com/nesubregion/p_neglect.html)

## Appendix C – Belief and Faith Related Abuse

### Female Genital Mutilation (FGM)

#### Definition

FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs. FGM is considered a form of abuse in the UK and is illegal.

- It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.
- What is FGM? It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. 4 types of procedure:
  - **Type 1** Clitoridectomy: partial/total removal of clitoris
  - **Type 2** Excision: Partial/total removal of clitoris and labia minora
  - **Type 3** Infibulation: entrance to vagina is narrowed by repositioning the inner/outer labia
  - **Type 4** All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.
- Why is it carried out? Belief that:
  - FGM brings status/respect to the girl – social acceptance for marriage
  - Preserves a girl's virginity
  - Part of being a woman / rite of passage
  - Upholds family honour
  - Cleanses and purifies the girl



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- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier
- FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries.
- Victims are most likely to come from communities where the practice of FGM is part of their heritage. It is important to note that the pupils may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

## The 'Once Chance' rule

A potential victim may only have one chance to ask for help. You may only have once chance to provide help, so it is important you get it right on the first occasion.

## Indicators of FGM

The list of possible indicators that a girl is at risk of FGM practices is shown below. It is important to view the whole picture and understand that a single indicator may not represent a possible risk of harm.

- Indicators that may show a heightened risk of FGM include the following:
  - The socio-economic position of the family and their level of integration into UK society.
  - Any girl with a mother or sister who has been subjected to FGM.
  - Any girl withdrawn from PSHE.
- Indicators that may show FGM could take place soon include the following:
  - When a female family elder is visiting from a country of origin.
  - A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'.
  - A girl may request help from a teacher if she is aware or suspects that she is at immediate risk.
  - A girl or her family taking a long trip abroad where the child's family are from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghanistan, Kurdistan, Indonesia and Pakistan).
  - The child talks about going abroad to be 'cut' or to prepare for marriage.
- Indicators that FGM may have already taken place include the following:
  - Difficulty walking, sitting or standing.
  - Spending longer than normal in the bathroom or toilet.
  - Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
  - Prolonged or repeated absences from school followed by withdrawal or depression, especially after a long holiday abroad.
  - Reluctance to undergo normal medical examinations.
  - Asking for help, but not being explicit about the problem due to embarrassment or fear.
  - Finding it difficult to sit still and looking uncomfortable.
  - Complaining about pain between legs.
  - Mentioning something that somebody did to them that they are not allowed to talk about.

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- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinary tract infections.
- Disclosure.

Further information can be found at: <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

## So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the wider community. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. Culture, tradition and religion are not an excuse for abuse. The indicators of HBV are similar to those in cases of FGM.

Forms of HBV include:

- Female Genital Mutilation
- Forced marriage
- Breast Ironing and other physical abuse
- Murder or forced suicide
- Rape
- Kidnap
- Abandonment in their country of origin
- Psychological pressure (strict monitoring, humiliation, threats).

## Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical, emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent because they are a child or have learning disabilities, for example. Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. (KCSIE 2019, pg. 22) Indicators include:

- Pupils may appear anxious, depressed and emotionally withdrawn with low self-esteem. They may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia.
- Sometimes they may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol.
- Often pupils' symptoms can be exacerbated in the periods leading up to the holiday season.
- Pupils may present with a sudden decline in their performance, aspirations or motivation.
- They may be subjected to excessive restrictions and control at home.
- Some pupils may not be allowed to attend any extra-curricular or after-school activities and be discouraged from making friends outside of their community.

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- Girls and young women may be accompanied to and from school/college, and even during lunch breaks by cousins, brothers or other members of the community.
- Some pupils may stop attending school or college because their parents insist.
- Their homework is incomplete, appears rushed or completed last minute. They may need to complete it late at night to hide their engagement in education which shows in school because they are lethargic, unable to concentrate and have a general appearance of tiredness.
- Professionals being told that the student is out of the country.
- Conflict between the student and their parents about whether the student will be allowed to continue their education.
- Family history of older siblings leaving education early and marrying early.

## How education professionals can help:

- Signposting, where appropriate, to forced marriage materials or where further support and advice can be accessed.
- Displaying relevant information e.g. details of the NSPCC helpline, Child Line, and appropriate local and national support groups on forced marriage.
- Ensuring that a private telephone is made available should pupils need to seek advice discreetly.
- Educating teachers, lecturers and other staff about the issues surrounding forced marriage and the presenting symptoms – appropriate training should be included in continuing professional development (CPD).
- Encouraging young people to access appropriate advice, information and support (Multiagency Practice Guidelines: Handling Cases of Forced Marriage pg. 32-36).  
<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>

School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmunit@fcdo.gov.uk](mailto:fmunit@fcdo.gov.uk).

## Appendix D – Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

### Definition

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. The different forms of abuse overlap. Perpetrators may subject children to multiple forms of abuse. 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. As well as being physical, exploitation can be facilitated and take place online.

In the case of CSE, the abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. Victims can be exploited even when activity appears consensual and it should be noted as exploitation. It can involve force and/or enticement-based methods or compliance and may, or may not, be accompanied by violence or threats of violence.

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## Indicators of exploitation

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

- Appearing with unexplained gifts
- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misuse of drugs and alcohol
- Frequent missing episodes
- Regularly missing school or education.

## Specific indicators of child sexual exploitation

As well as the signs above, particular indications exist for CSE:

- Underage sexual activity
- Inappropriate sexualised behaviour
- Sexually risky behaviour, 'swapping' sex, using sex as a form of self-harm
- Repeated sexually transmitted infections
- In girls, repeated pregnancy, abortions, miscarriage
- Having multiple unaffordable new things (clothes, mobile phones and worrying about losing contact via mobile phone
- Having unaffordable new things (clothes, mobile phone) or expensive habits (alcohol, drugs)
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Hanging out with groups of older people, anti-social groups, or with other vulnerable peers
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Associating with other young people involved in sexual exploitation
- Recruiting other young people into exploitative situations
- Truancy, exclusion, disengagement with school, opting out of education altogether
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, mood swings, volatile behaviour, emotional distress)
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders;
- Getting involved in crime/police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint, sexual assault.

## Appendix E – Homelessness

### Definition

Where a household has no home, anywhere in the world, available and reasonable to occupy. Homelessness does not just refer to people who are sleeping rough and is not just a problem found in affluent high-value housing markets such as London or the South East.

The following housing circumstances are examples of homelessness:

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- Rooflessness (without a shelter of any kind, sleeping rough)
- Houselessness (with a place to sleep but temporary, in institutions or a shelter)
- Living in insecure housing (threatened with severe exclusion due to insecure tenancies, eviction, domestic violence, or staying with a family and friends known as 'sofa surfing')
- Living in inadequate housing (in caravans on illegal campsites, in unfit housing, in extreme overcrowding).

Being homeless or being at risk of being homeless presents a real risk to a child's welfare. The Homelessness Reduction Act 2017 places a new legal duty on English councils, so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The homelessness Reduction Act factsheets summarise the new duties, which shift the focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

The department for Levelling Up, Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation.

Indications of possible homelessness can be seen in section 22 of this policy.

## **Appendix F – County Lines Criminal Activity**

### **Definition**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK. They do this using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

- Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines. Criminal networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for purposes of transporting drugs. A referral to the National Referral Mechanism should be considered where there is a trafficking element.
- Like other forms of abuse and exploitation, county lines exploitation:
  - Can affect any child or young person (male or female) under the age of 18 years;
  - Can be perpetrated by individuals or groups, males or females, and young people of adults; and
  - Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Further information can be found at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/863323/HOCountyLinesGuidance\\_-\\_Sept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863323/HOCountyLinesGuidance_-_Sept2018.pdf)



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## How does it work?

The term cuckoo refers to a drug dealer taking over the home of a vulnerable person to use as a base to sell or manufacture drugs.



## Indicators

Signs and indicators may be the same as those in cases of CSE and CCE and may also include:

- Persistently going missing from home or school
- Being found out of area
- Unexplained acquisition of money, clothes or mobile phone
- Excessive receipt of calls and text messages
- Relationships with older, controlling individuals
- Associated with gangs
- Leaving home or care without explanation
- Suspicion of self-harm, physical assault or unexplained injuries
- Parental concerns
- Significant decline in school performance
- Significant changes in emotional wellbeing.

## Appendix G – Preventing radicalisation

### Definition

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a school's or college's safeguarding approach.

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with 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.

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There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation from being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL or DDSL making a Prevent referral.

The school's or college's DSL and DDSLs should be aware of local procedures for making a Prevent referral.

Further information and list of indicators can be found at:

<https://educateagainsthate.com/radicalisation-and-extremism/>

## **The Prevent Duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools and colleges' wider safeguarding obligations. DSLs, DDSLs and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). DSLs DDSLs and other senior leaders in colleges should familiarise themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and **IT policies**.

## **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The DSL or DDSL should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. 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.

## **Additional support**

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The Department has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all of the other factors relevant to how they carry out their usual functions.

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#) is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (EFT) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings to comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The EFT Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

## Risk indicators of vulnerable pupils

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

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- Experiences of dealing with the police
- Involvement with criminal groups.

## **Making a decision to refer**

The process of referring to under the Prevent Duty to Channel should include robust clear indications of risk. It is good practice for staff to ask themselves:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purpose of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Does the pupil sympathise with or support illegal/illicit groups?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Has the pupil witnessed or been a victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations?
- Has the pupil employed any methods to disguise their identity?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil the victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

Critical indicators include where the pupil is:

- In contact with extremist recruiters;
- Articulating support for extremist causes or leaders;
- Accessing extremist websites;
- Possessing extremist literature;
- Using extremist narratives and global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining extremist organisations;

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- Making significant changes to their appearance and/or behaviour.

## Appendix H Child-on-child Sexual Violence and Sexual Harassment

### Definitions

Children can abuse other children (often referred to as peer-on-peer abuse). This is most likely to include, but may not be limited to, the forms of abuse noted in section 16 of this policy and below:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (possibly including an online element as described above).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity against their will, forcing them to strip, touch themselves sexually or engage in sexual acts with another person.
- Sharing of nude or semi-nude images and/or videos (consensual or non-consensual). This is also known as sexting or youth produced sexual imagery.
- Up-skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals.

### Sexual harassment

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a pupil's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment includes:

- Sexual comments;
- Sexual "jokes" and taunting;
- Physical behaviour, such as deliberately brushing against another pupil;
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

### Sexual violence

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



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(Schools should be aware that sexual assault covers a very wide range of behaviours so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

- Causing someone to engage in sexual activity without consent: a person (a) commits an offence if: they intentionally cause another person (b) to engage in an activity, the activity is sexual, (b) does not consent to engaging in the activity, and (a) does not reasonably believe that (b) consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

## Harmful sexual behaviours

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

## What is consent?

Rape Crisis England & Wales – Sexual consent, 136; Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time the activity occurs. Someone consents to vaginal, anal or penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: <https://rapecrisis.org.uk/get-informed/about-sexual-violence/sexual-consent/>

## Up-skirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible for a specific purpose.

- A “specific purpose” is namely:
  - Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
  - To humiliate, distress or alarm the victim.
- “Operating equipment” includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.

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## Appendix I – Trafficking & Modern Slavery

### Definition

“Trafficking of persons” shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

- Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs; “Child” shall mean any person under eighteen years of age. The Palermo Protocol establishes children as a special case. Any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. This is partly because it is not considered possible for children to give informed consent. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected too.
- Why are children being trafficked? Children are being trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Although there is no evidence of other forms of exploitation such as ‘organ donation’ or ‘harvesting’, all agencies should remain vigilant. Children may be trafficked from other countries for a variety of reasons.
- There are a number of factors in the country of origin which might make children vulnerable to being trafficked. The factors listed below are by no means a comprehensive list:
  - Poverty
  - Lack of education
  - Discrimination
  - Cultural attitudes
  - Grooming
  - Dysfunctional families
  - Political conflict and economic transition
  - Inadequate local laws and regulations.

### Potential indicators

- Once in the UK the child:
  - Receives unexplained/unidentified phone calls whilst in placement/temporary accommodation.
  - Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy.
  - Has a history with missing links and unexplained moves.
  - Has gone missing from local authority care.
  - Is required to earn a minimum amount of money every day.
  - Works in various locations.
  - Has limited freedom of movement.
  - Appears to be missing for periods.

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- Is known to beg for money.
- Performs excessive housework for chores and rarely leaves the residence.
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good.
- Is one among a number of unrelated children found at one address.
- Has not been registered with or attended a GP practice.
- Has not been enrolled in school.
- Has to pay off an exorbitant debt, e.g. for travel costs, before having control over own earnings, is permanently deprived for a large part of their earnings by another person; and/or is excessively afraid of being deported.

Further information: <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

## Appendix K – Contacts and Advice

### Expert organisations

#### Barnardo's

<https://www.barnardos.org.uk/>

Tel: 0208 550 8822

#### Lucy Faithfull Foundation

<https://www.lucyfaithfull.org.uk/>

Tel: 0152 7591922

#### NSPCC

<https://www.nspcc.org.uk/>

Tel : 0808 800 5000

#### Rape Crisis

<https://rapecrisis.org.uk/>

Tel: 0808 802 9999

#### Contextual Safeguarding Network

<https://www.contextualsafeguarding.org.uk/>

Email: contextual.safeguarding@durham.ac.uk

#### UK Safer Internet Centre

<https://saferinternet.org.uk/>

Tel: 0344 800 2382

### Support for victims

#### Anti-Bullying Alliance

<https://anti-bullyingalliance.org.uk/>

Tel: 07721 097 033

#### Ministry of Justice - Victim Support

<https://www.gov.uk/guidance/victim-and-witness-services>

# Child Protection and Safeguarding Policy

Tel: 0808 16 89 111

[The Survivor's Trust](https://www.thesurvivorstrust.org/)

<https://www.thesurvivorstrust.org/>

Tel: 08088 010 818

[Victim Support](https://www.victimsupport.org.uk/)

<https://www.victimsupport.org.uk/>

Tel: 08 08 16 89 111

## **Further information on confidentiality and information sharing**

[Gillick Competency Fraser Guidelines](https://learning.nspcc.org.uk/child-protection-system/gillick-competence-fraser-guidelines)

<https://learning.nspcc.org.uk/child-protection-system/gillick-competence-fraser-guidelines>

[Government Information Sharing Advice](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1062969/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf)

[Information Commissioner's Office: Education](https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/right-of-access/education-data/)

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/right-of-access/education-data/>

## **Support for parents on digital safeguarding**

[Parentzone](https://www.parents.parentzone.org.uk/morearticles/digital-safeguarding-in-schools)

<https://www.parents.parentzone.org.uk/morearticles/digital-safeguarding-in-schools>

[CEOP Thinkuknow](https://www.thinkuknow.co.uk/)

<https://www.thinkuknow.co.uk/>

# Designated Safeguarding Leads

Appendix L



Deirdre Pearson  
07926 437837



Christine Smiles  
07593 454373



Jo Reiling  
07970 836322

# Deputy Designated Safeguarding Lead



Gavin Jackson



Karen Cowans