



## **CHILD PROTECTION AND SAFEGUARDING POLICY**

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## School Child Protection and Safeguarding Policy Framework

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

(Keeping Children Safe in Education)

### 1. Ethos statement

Safeguarding at Broadlands Hall School is considered everyone's responsibility and as such our school aims to create a safe and welcoming environment. This is underpinned by a culture of openness within which all students and adults feel secure, able to raise concerns believing they are being listened to, that appropriate action will be taken to ensure they are safe and have the opportunity to achieve the best possible outcomes.

We recognise the moral and statutory responsibility placed on all staff to safeguard and promote the welfare of all children. Broadlands Hall School recognises the contribution it can make in ensuring that all pupils registered or who use our school, feel that they will be listened to and have appropriate action taken to any concerns they may raise. Children at our school will be able to talk freely to any member of staff or regular visitor if they are worried or concerned about something. All staff and regular visitors will, either through training or their induction know how to recognise a disclosure from a child and will know how to manage this effectively. We will not make promises to any child and we will not keep secrets. Every child will know that their chosen adult will have to act on whatever they have been told appropriately.

The school will endeavour to provide activities and opportunities in the PHSE curriculum that will equip our children with the skills they need to stay safe. This will also be extended to include material that will encourage our children to develop essential life skills. We will do this by endeavouring to work in partnership with other agencies and seek to establish effective working relationships with parents and carers.

## 2. Introduction

The Proprietor recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance, Keeping Children Safe in Education (KCSiE), Working Together to Safeguard Children and locally agreed inter-agency procedures put in place by Suffolk Safeguarding Partnership Board.

This policy will be reviewed annually, as a minimum, and will be made available publicly via the school website or on request.

Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

This policy is for all staff, parents, volunteers, supply staff and contractors and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with the school's:

- Code of Conduct for staff and adults in school
- ICT and Internet Acceptable Use Policy
- Safer Recruitment Policy
- Anti-Bullying Policy
- Mobile Phone Policy
- Whistleblowing Procedure
- Information Manual Handbook
- Intimate Care Policy
- SEND Policy
- Supporting Children with Medical Conditions Policy
- Health and Safety Policy
- Educational Visits Policy
- Accessibility Plan
- Parent, carer and visitor behaviour policy
- Sex and Relationships Policy
- Suffolk Children Missing from Education Protocol
- and Part 5 of KCSiE, copies of which will be provided to all staff on induction.

The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of children and young people, and ensure that all staff understand and meet their statutory responsibilities;
- Ensure consistent good practice across the school.

The Proprietor expects that all staff will have read and understand this child protection and safeguarding policy and their responsibility to implement it. Staff working directly with children **must**, as a minimum, have read and understand [Part One of KCSiE](#) and [Annex B](#). The Proprietor will ensure that they and senior leaders have read and understand [Parts One and Two of KCSiE](#). The Proprietor will ensure that those staff who do not work directly with children have read either

Part One or Annex A of KCSiE<sup>1</sup> together with Annex B. There may some staff whom the Proprietor require they read additional sections<sup>2</sup>.

The Proprietor will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated.

Compliance with the policy will be monitored by the Headteacher, designated safeguarding lead (DSL) and the Proprietor.

### **3. Statutory framework**

Section 175 of the Education Act 2002 (as amended) in the case of maintained schools and pupil referral units<sup>3</sup>, Section 157 of the Education Act 2002 (as amended) and the Education (Independent School Standards) Regulations 2014 for independent schools (including academies and free schools), the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) for post 16 education providers, place a statutory duty on governing bodies and Proprietors to have policies and procedures in place that safeguard and promote the welfare of children and young people who are pupils of the school which must have regard to any guidance given by the Secretary of State.

In accordance with statutory guidance, Working Together to Safeguard Children 2018, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have equal and joint responsibility for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements. In Suffolk, all schools have been named by the Suffolk Safeguarding Partnership (SSP) as relevant agencies, this means staff in schools must work in accordance with the multi-agency procedures developed by the Suffolk Safeguarding Partnership (SSP) which can be found on their website at: <https://suffolksp.org.uk/>.

### **4. Key roles and responsibilities**

#### **The Proprietor**

The Proprietor has a strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The governing body has a legal responsibility to make sure that there are appropriate policies and procedures in place, which have regard to statutory guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote children and young people's welfare. The Proprietor will also ensure that the policy is made available to parents and carers by publishing this on the school website or in writing if requested.

The Proprietor will ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring safeguarding and child protection are at the

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<sup>1</sup> Annex A of KCSiE is a condensed version of Part One of KCSiE. Whilst it is a matter for schools, based on their assessment, SCC and Suffolk Safeguarding Partnership take the view that it should only be those staff that do not have regular direct contact with children in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.

<sup>2</sup> The governing body/proprietor may decide that for some roles should read additional parts of the guidance e.g. colleagues involved in safer recruitment administration including the maintenance of the single central record should also read Part Three of KCSE.

<sup>3</sup> Section 175, Education Act 2002 – for management committees of pupil referral units, this is by virtue of regulation 3 and paragraph 19A of Schedule 1 to the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007

forefront and underpin all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear and easy to understand and operate with the best interests of the child at their heart.

The Proprietor will ensure that where there is a safeguarding concern school leaders will make sure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The Proprietor will ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children and that the school's safeguarding arrangements take into account the procedures and practice of the locally agreed multi-agency safeguarding arrangements in place.

The Proprietor will ensure that, as a minimum, the following policies are in place to enable appropriate action to be taken to safeguard and promote the welfare of children and young people as appropriate:

- child-on-child abuse
- online safety,
- behaviour, including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- special educational needs and disability
- supporting pupils in school with medical conditions
- staff code of conduct/behaviour policy (which should also include the procedures that will be followed to address low-level concerns and allegations made against staff, and acceptable use of IT, including the use of mobile devices and communications, including the use of social media.)
- procedure for responding to children who go missing from education, particularly on repeat occasions.
- safer recruitment

It is the responsibility of the Proprietor to ensure that staff and volunteers are properly vetted to make sure they are safe to work with the pupils who attend our school and that the school has procedures for appropriately managing safeguarding allegations made against, or low level concerns involving, members of staff (including the Headteacher, supply teachers, contractors, and volunteer helpers).

The Proprietor will ensure that there is a Designated Safeguarding Lead (DSL) who is a senior member of the leadership team and has lead responsibility for safeguarding and child protection, and a designated teacher to promote the educational achievement of children who are looked after, or previously looked after, and will ensure that these people have the appropriate training.

The Proprietor will have regard to their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).<sup>4</sup>

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<sup>4</sup> Set out in paragraphs 83-93 of KCSiE

The Proprietor will inform Suffolk County Council and the SSP annually about the discharge of their safeguarding duties by completing the safeguarding self-assessment audit.

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

The DSL will take lead responsibility for safeguarding and child protection (including online safety including and understanding the filtering and monitoring systems in place). This will be made explicit in the role-holder's job description. (The broad areas of responsibility and activities related to the role of the DSL are set out in Annex C of KCSiE).

The DSL will have the appropriate status, authority, time, funding, training, resources and support they need to carry out the duties of the post effectively.

The DSL and any alternate DSLs will provide advice and support to staff in school and will liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children.

During term time, the DSL and/or an alternate should always be available during school hours for staff to discuss any safeguarding concerns. The DSL will make arrangements for adequate and appropriate cover arrangements for any out of hours/out of term time activities.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role. This training will be updated every two years.

The DSL will liaise with the Headteacher to inform them of issues and in particular ongoing enquiries under section 47 of the Children Act 1989 and police investigations.<sup>5</sup>

### **Headteacher**

The Headteacher will ensure that the policies and procedures adopted by the Proprietor are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole school approach to safeguarding.

The headteacher will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

### **All staff**

All staff have a responsibility to provide a safe environment in which children can learn.

All staff working directly with children must read and ensure they understand at least Part One of KCSiE. Those staff that do not work directly with children (e.g. cleaners, caretaker) must read and ensure they understand either at least Part One or Annex A of KCSiE.

All staff must ensure they are familiar with the systems within school which support safeguarding, including the child protection and safeguarding policy, the code of conduct/staff behaviour policy, the behaviour policy, the safeguarding response to children who go missing from education, and the role of the DSL (including the identity of the DSL and any deputies). These will be explained to all staff on induction.

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<sup>5</sup> See LA explanatory note on the requirements around children having an appropriate adult [Schools-StopSearch-v2.3.pdf \(squarespace.com\)](#)

All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. All staff should maintain a belief that 'it could happen here' where safeguarding is concerned and if staff have any concerns about a child's welfare they must act on them immediately.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should know what to do if a child tells them he/she is being abused, neglected or exploited, and/or is otherwise at risk of involvement in criminal activity, such as knife crime, or involved in county lines drug dealing.

All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) along with the role they might be expected to play in such assessments.

All staff should be aware of the [Early Help » Suffolk Safeguarding Partnership \(suffolksp.org.uk\)](http://suffolksp.org.uk) and understand their role within it. This includes providing support as soon as a problem emerges, liaising with the DSL, and sharing information with other professionals in order to support early identification and assessment, focussing on providing interventions to avoid escalation of worries and needs (see Section 12: Information Sharing). In some cases, staff may be asked to act as the lead professional in undertaking an early help assessment.

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (SEN) (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation (FGM) or forced marriage
- is a privately fostered child
- is persistently absent from education, including persistent absences for part of the school day

Knowing what to look out for is vital to the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation. If staff are unsure, they should always speak to the DSL (or deputy). If in exceptional circumstances the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from children's

social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible. Details of the school's safeguarding team are on the front this policy.

## 5. Induction & Training

The Proprietor will ensure that all staff receive appropriate safeguarding and child protection training (including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring) which is regularly updated and [in line with advice from SSP](#). In addition, all staff members will receive regular safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and up to date knowledge of emerging and evolving safeguarding issues to safeguard children effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, online safety, the code of conduct/staff behaviour policy, low-levels concerns guidance, the behaviour policy, the safeguarding response to children who are absent from education, and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSiE (or Annex A for those staff who do not work directly with children)<sup>6</sup> will be provided to new staff at induction.

The Proprietor will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Headteacher will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

In considering safeguarding training arrangements the Proprietor will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and require teachers to have a clear understanding of the needs of all pupils.

## 6. Recognising concerns - signs and indicators of abuse.

All staff should be aware of indicators of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise **professional curiosity** and know what to look for as this is vital for the early identification of abuse or neglect.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should consider whether children might be at risk of abuse of exploitation in situations outside their families – harms take a variety of different forms and children can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse in

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<sup>6</sup> Dependent on school stance on the condensed version of KCSiE. Whilst it is a matter for schools, based on their assessment, SCC and Suffolk Safeguarding Partnership take the view that it should only be those staff that do not have regular contact with children in school, e.g. cleaners who come in out of school hours, who are expected to only read the condensed version of Part One of KCSiE.



their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

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

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

### **Indicators of abuse and neglect**

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

The following indicators listed under the categories of abuse are not an exhaustive list:

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

**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 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.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). 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 (also known as child-on-child abuse) in education and all staff should be aware

of it and of the school's policy and procedures for dealing with it. (See section 7: Specific safeguarding issues)

**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 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.

(Source: Keeping Children Safe in Education)

## 7. Specific safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as of drug taking and/or alcohol abuse, deliberately missing education, serious violence (including that linked to county lines) and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

### **Child-on-child abuse**

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there no reports in school it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy) and record these using the school/college's safeguarding system – CPOMs.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" 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.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- 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 without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- Consensual and non-consensual sharing of nudes and semi nudes images and or videos<sup>7</sup> (also known as sexting or youth produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff should be clear about the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. More information can be found below in **Section 12 Allegations of Abuse Made Against Other Pupils.**

### **Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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

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

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include 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.

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<sup>7</sup> UKCIS guidance: Sharing nudes and semi-nudes advice for education settings.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That's abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn.

### **Female Genital Mutilation (FGM)**

Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers<sup>8</sup>. We are an all boys school but if a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **Mental Health**

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education 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.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

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

### **Serious violence**

All staff should be aware of the indicators which may signal that children are at risk from, or involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

## **8. Children potentially at greater risk of harm**

The Proprietor recognises that whilst all children should be protected there are some groups of children who are potentially at greater risk of harm and, in some cases, these children may find it difficult to communicate what is happening to them.

### **Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to complex safeguarding or welfare needs. Children may

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<sup>8</sup> Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England)

need this help due to abuse, neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The Proprietor expects that the Local Authority will share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both LAs and school to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

The school follows the procedures set out in *Suffolk's Children Missing from Education Protocol* document. This is kept with all school policies located in the school and can be found at <https://suffolksp.org.uk/working-with-children-and-adults/children/education/>

This includes informing the LA if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the LA, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

Further information and support includes:

- schools' duties regarding children missing education, including information schools must provide to the LA when removing a child from the school roll at standard and non-standard transition points can be found in the DfE's statutory guidance: [Children Missing Education](#).
- General information and advice for schools can be found in the Government's [Missing Children and Adults Strategy](#).
- further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#)
- guidance for schools concerning children who are absent from education [Working Together To Improve School Attendance](#)

### **Children requiring mental health support**

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.

The governing body will ensure there is a clear system and process in place for identifying possible mental health problems, including routes to escalate, and a clear referral and accountability system. Where staff have concerns about children who need mental health support, these should be referred to the DSL.

Staff can access further advice in a DfE guidance documents [Preventing and tackling bullying](#) and [mental health and behaviour in schools](#) which set out how staff can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of pupils.

**Looked after children and previously looked after children.**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Proprietor will ensure staff have the skills, knowledge and understanding to keep looked after children safe.

The Proprietor will ensure there are arrangements in place so that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

Appropriate staff will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after the child. The DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. The Proprietor recognises that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

For children who are care leavers, the DSL should have details of the LA Personal Advisor appointed to guide and support the care leaver and liaise with them as necessary regarding any issues of concern.

Staff should avoid making assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability or medical condition without further exploration.

Staff should also be aware that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Similarly, staff should be aware of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing signs or being able to communicate how they are feeling.

Staff also need to be mindful of children's cognitive understanding, for example, whether they are able to understand the difference between fact and fiction in online content and the consequences of repeating the content/behaviours in school.

As such, any reports of abuse involving children with SEND will require close liaison with the DSL and SENCO.

Further information can be found in the DfE's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

## **9. Opportunities to teach safeguarding**

The Proprietor will ensure that children and young people are taught about how to keep themselves and others safe, including online.

The Proprietor recognises that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and SEND needs.

Relevant topics will be included within Relationships Education and through Health Education having regard to statutory guidance.

Preventative education is most effective in the context of a whole-school approach that prepares children and young people for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

The Proprietor expects that the school's values and standards should be upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSE delivered in regularly timetables lessons and reinforced throughout the whole curriculum. This whole-school approach will be fully inclusive and developed to be age and stage of development appropriate, and will tackle (in age-appropriate stages) issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise and abusive relationship, including coercive and controlling behaviour
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

The school will ensure that there are appropriate filters and monitoring systems in place to safeguard children and young people from potentially harmful and inappropriate online material.

## **10. Online safety and filtering and monitoring**

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm.

The Proprietor has had due regard to the additional information and support set out in KCSiE and ensures that the school has a whole school approach to online safety, and has a clear policy on use of communications technology in school. Online safety will be a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school adopts a whole school approach to online safety to protect and educate pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate.

Online safety issues can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, or radicalisation or extremism;
- Contact: being exposed to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- Conduct: online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images, and online bullying); and

- Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or pupils are at risk this should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

The Proprietor will ensure that an annual review is undertaken of the school's approach to online safety including the school's filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks pupils face online. The review should include a member of the senior leadership team, the DSL, the IT service provider and the Proprietor. The school should ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on cyber security including considerations can be found at [Cyber security training for school staff - NCSC.GOV.UK](https://www.ncsc.gov.uk)

The school's online safety policy outlines the appropriate filtering and monitoring which take places on school devices and school networks. It also outlines the expectations, applicable roles and responsibilities in relation filtering and monitoring.

School staff can access resources, information and support as set out in Annex B of KCSiE.

The school Mobile Phone and Smart Technology Policy sets out expectations for the use of these devices by pupils in school.

## **11. Procedures**

If staff notice any indicators of abuse/neglect or signs that a child or young person may be experiencing a safeguarding issue they should record their concerns and inform the DSL without delay.

### **What to do if you are concerned.**

If a child makes an allegation or disclosure of abuse against an adult or other child or young person, it is important that you:

- Stay calm and listen carefully;
- Accept what is being said;
- Allow the child/young person to talk freely – do not interrupt or put words in the child/young person's mouth;
- Only ask questions when necessary to clarify, do not investigate or ask leading questions;
- Reassure the child, but don't make promises which it might not be possible to keep;
- Do not promise confidentiality;
- Emphasise that it was the right thing to tell someone;
- Reassure them that what has happened is not their fault;
- Do not criticise the perpetrator;
- Explain what has to be done next and who has to be told;
- Make a written record, which should be signed and include the time, date and your position in school;
- Do not include your opinion without stating it is your opinion;
- Pass the information to the DSL or alternate without delay
- Consider seeking support for yourself and discuss this with the DSL as dealing with a disclosure can be distressing.



When a record of a safeguarding concern is passed to the DSL, the DSL will record the time and date the record of concern was received. The DSL will assess the concern and, taking into account any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached or may be a child in need. If the DSL is unsure whether the threshold has been met, they will contact the MASH Professional Consultation Line for advice (0345 606 1499). Where appropriate, the DSL will complete and submit the SSP multi agency referral form (MARF) ([available on the SSP website](#))<sup>9</sup>.

Where the DSL believes that a child or young person may be at imminent and significant risk of harm they should call Customer First immediately and then complete the SSP MARF within 24 hours to confirm the referral. In these circumstances, it is important that any consultation should not delay a referral to Customer First.

Where a safeguarding concern does not meet the threshold for completion of a MARF, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help including the school or college's local early help offer.

School staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conferences in advance of the meeting in accordance with SSP procedures and timescales.

Where reasonably possible, the school is committed to obtaining more than one emergency contact number for each pupil.

School staff must ensure that they are aware of the procedure to follow when a child goes missing from education. Attendance of all pupils is monitored closely. The school follows the procedures set out in *Suffolk's Children Missing from Education Protocol* document. This is kept with all school policies located in the school and can be found at <https://suffolksp.org.uk/working-with-children-and-adults/children/education/>

Further information can be found in Appendix A.

Concerns about child-on-child abuse should be recorded and given to the DSL.

## **12. Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk

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<sup>9</sup> N.B. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police, although the DSL should also be made aware.

- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

### **Procedures for dealing with allegations of child-on-child abuse**

If a pupil makes an allegation of abuse against another pupil:

- Staff must record the allegation and pass onto the DSL, but do not investigate it
- The DSL will contact the MASH team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the child harmed and the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

### **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse to any trusted adult
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong

- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

### **13. Information sharing, record keeping and confidentiality**

Information sharing is vital in safeguarding children by identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, the school understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff will have regard to the Government guidance: [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the DSL or a deputy.

Well-kept records are essential to good child protection practice. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

The school recognises that confidentiality should be maintained in respect of all matters relating to child protection. Information on individual child protection cases may be shared by the DSL or alternate DSL with other relevant members of staff. This will be on a 'need to know' basis and where it is in the child's best interests to do so.

A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils), or promise a child to keep a secret which might compromise the child's safety or wellbeing.

As well as allowing for information sharing, in circumstances where it is warranted because it would put a child at risk of serious harm, the DPA 2018 and the GDPR allow schools to withhold information. This may be particularly relevant where a child is affected by domestic abuse perpetuated by a parent or carer, is in a refuge or another form of emergency accommodation, and the serious harm tests is met.

Ordinarily, the school will always undertake to share its intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. It would be legitimate to share information without consent where: it is not

possible to gain consent; it cannot reasonably be expected that a practitioner gains consent; and, if to gain consent would put a child at risk. If in doubt, staff will consult with the MASH Professional Consultation Line on this point.

The school will have regard to [SCC Guidance for schools on maintaining and transferring pupil safeguarding/child protection records](#). Where a child leaves the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The file will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

#### **14. Managing allegations made against teachers, including supply teachers, other staff, volunteers and contractors**

The school will follow the SSP [Arrangements for Managing Allegations of Abuse Against People Who Work With Children or Those Who Are in A Position of Trust](#) if a safeguarding concern or allegation is raised against an adult in a position of trust.

An allegation that may meet the harm threshold is any information which indicates that a member of staff /volunteer may have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he/she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This applies to any child the member of staff, supply teacher, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in our school.

If any member of staff has concerns that a colleague, supply teacher, volunteer or contractor might pose a risk to children, it is their duty to report these to the headteacher. Where the concerns or allegations are about the Headteacher, these should be referred to the Proprietor.

The Headteacher/ Proprietor should report the concern to the Local Authority Designated Officer (LADO) within one working day.

The corporate director for Children and Young People's Services, has identified dedicated staff to undertake the role of LADO. LADOs can be contacted via email on [LADO@suffolk.gov.uk](mailto:LADO@suffolk.gov.uk) or by using the LADO central telephone number: **0300 123 2044** for allegations against all staff and volunteers.

#### **15. Whistleblowing**

The Proprietor recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

Whistleblowing is 'making a disclosure in the public interest' and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example, pupils in the school or members of the public.

The Proprietor would wish for everyone in the school community to feel able to report any child protection/safeguarding concerns through existing procedures within school, including the Whistleblowing Policy adopted by Proprietor where necessary. However, for members of staff who do not feel able to raise such concerns internally, there is a NSPCC whistleblowing helpline. Staff can call 0800 028 0285 (line available from 8.00am to 8.00pm, Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **16. Useful Contacts:**

Multi-agency Safeguarding Hub (MASH) Professional Helpline: 0345 606 1499

MASH [webchat facility](#)

Customer First (Professional Referral Line) for use in emergencies only: 0345 606 6167

Customer First: 0808 800 4005

Police (emergency only): 999

Suffolk Police main switchboard: 01473 613500

Suffolk Police Cybercrime Unit: 101

Suffolk Local Safeguarding Partnership [www.suffolksp.org.uk](http://www.suffolksp.org.uk)

Suffolk County Council: [www.suffolk.gov.uk/community-and-safety/staying-safe-online/e-safer-suffolk/](http://www.suffolk.gov.uk/community-and-safety/staying-safe-online/e-safer-suffolk/)

LADO 0300 123 2044 or [lado@suffolk.gov.uk](mailto:lado@suffolk.gov.uk) or on the [LADO pages](#) on Suffolk Safeguarding Partnership website

# 1. Appendix A – further information on specific safeguarding issues

**Further information on specific safeguarding issues** (source: Annex A, KCSiE)

## **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11 year olds](#) and [12-17 year olds](#).

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

## **Children missing from education**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zone, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school or college's unauthorised absence and children missing from education procedures.

## **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **Child sexual exploitation**

Child sexual exploitation is a form of sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) 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 sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- can still be abuse even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the 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.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

### **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug 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 episode, when the victim may have been trafficked or the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>10</sup> should be considered. 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 affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **Domestic abuse**

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial; and
- emotional

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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC-UK domestic-abuse signs symptoms effects](#)

[Refuge what is domestic violence/effects of domestic violence on children](#)

[Safelives: young people and domestic abuse](#)

### **Homelessness**

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<sup>10</sup> [National crime agency human-trafficking](#)

Being homeless or at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

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 following factsheets usefully summarise the new duties. [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have just published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#)

### **So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage)**

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 community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. 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.

#### **Actions**

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**<sup>11</sup> that requires a different approach (see following section).

#### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

#### **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2016) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence and they should **not** be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to

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<sup>11</sup> Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).



have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>12</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

### **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 one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example.) Nevertheless, some communities use religion and culture as a way to coerce a person into marriage, Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk).

### **Preventing radicalisation**

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

[Extremism](#)<sup>13</sup> is the vocal or active opposition to our fundamental values, including 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](#)<sup>14</sup> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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) and settings (such as the internet).

However, it is possible to protect vulnerable people from ideology and intervene to prevent those at risk of radicalisation 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 may be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

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<sup>12</sup> Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

<sup>13</sup> As defined in the Government’s Counter Extremism Strategy

<sup>14</sup> As defined in the Revised Prevent Duty Guidance for England and Wales

## 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<sup>15</sup> to the need to prevent people from being drawn into terrorism”.<sup>16</sup> This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the [Revised Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76 which are specifically concerns with schools (and also covers childcare). The guidance is set out in terms of four general themes: Risk assessment, working in partnership, staff training, and IT policies.

### Additional support

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

There is additional guidance: [Prevent duty guidance: for further education institutions in England and Wales](#) that applies to colleges.

[Educate Against Hate](#), a website launched by Her Majesty’s Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

### Channel

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel Guidance](#), and a Channel awareness e-learning programme is available for staff at: [Channel General Awareness](#).

The school or college’s Designated Safeguarding Lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

### Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

## Sexual violence and sexual harassment between children in schools and colleges

### Context

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered

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<sup>15</sup> 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 the other factors relevant to how they carry out their usual functions.

<sup>16</sup> “Terrorism” for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risk normalising them.

## **What is sexual violence and sexual harassment?**

### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences in the Sexual Offences Act 2003<sup>17</sup> as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?**<sup>18</sup> 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 activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.<sup>19</sup>

### **Sexual harassment**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.<sup>20</sup> It may include:
  - non-consensual sharing of sexual images and videos;

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<sup>17</sup> [Legislation.gov.uk](http://legislation.gov.uk)

<sup>18</sup> It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped, More information [here](#)

<sup>19</sup> [PSHE Teaching about consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key Stage 3 and 4.

<sup>20</sup> [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats; and
- upskirting

### The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 23 in Part 1 of KCSI.E. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

### Additional advice and support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	<a href="#">What to do if you're worried a child is being abused</a>	DfE advice
	<a href="#">Domestic abuse: Various Information/Guidance</a>	Home Office
	<a href="#">Faith based abuse: National Action Plan</a>	DfE advice
	<a href="#">Relationship abuse: disrespect nobody</a>	Home Office website
Bullying	<a href="#">Preventing bullying including cyberbullying</a>	DfE advice
Children and the courts	<a href="#">Advice for 5-11 year old witnesses in criminal courts</a>	MoJ advice
	<a href="#">Advice for 12-17 year old witnesses in criminal courts</a>	MoJ advice
Children missing from education, home or care	<a href="#">Children missing education</a>	DfE statutory guidance
	<a href="#">Children missing from home or care</a>	DfE statutory guidance
	<a href="#">Children and adults missing strategy</a>	Home Office strategy
Children with family members in prison	<a href="#">National Information Centre on Children of Offenders</a>	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	<a href="#">County Lines: criminal exploitation of children and vulnerable adults</a>	Home Office guidance
	<a href="#">Child sexual exploitation: guide for practitioners</a>	DfE
	<a href="#">Trafficking: safeguarding children</a>	DfE and HO guidance
Drugs	<a href="#">Drugs: advice for schools</a>	DfE and ACPO advice
	<a href="#">Drugs strategy 2017</a>	Home Office strategy
	<a href="#">Information and advice on drugs</a>	Talk to Frank website
	<a href="#">ADEPIS platform sharing information and resources for schools: covering drug (&amp; alcohol) prevention</a>	Website developed by Mentor UK
"Honour Based Violence"  (so called)	<a href="#">Female genital mutilation: information and resources</a>	Home Office
	<a href="#">Female genital mutilation: multi agency statutory guidance</a>	DfE, DH, and HO statutory guidance
	<a href="#">Forced marriage: statutory guidance and government advice</a>	Foreign Commonwealth Office and Home Office
Health and Well-being	<a href="#">Fabricated or induced illness: safeguarding children</a>	DfE, Department for Health and Home Office
	<a href="#">Rise Above: Free PSHE resources on health, wellbeing and resilience</a>	Public Health England resources
	<a href="#">Medical conditions: supporting pupils at school</a>	DfE statutory guidance
	<a href="#">Mental health and behaviour</a>	DfE advice
Homelessness	<a href="#">Homelessness: How local authorities should exercise their functions</a>	HCLG
Online	<a href="#">Sexting: responding to incidents and safeguarding children</a>	UK Council for Child Internet Safety
Private fostering	<a href="#">Private fostering: local authorities</a>	DfE – statutory guidance
Radicalisation	<a href="#">Prevent duty guidance</a>	Home Office guidance
	<a href="#">Prevent duty advice for schools</a>	DfE advice
	<a href="#">Educate Against Hate Website</a>	DfE and Home Office
Violence	<a href="#">Gangs and youth violence: for schools and colleges</a>	Home Office advice

	<a href="#">Ending violence against women and girls 2016-2020 strategy</a>	Home Office strategy
	<a href="#">Violence against women and girls: national statement of expectations for victims</a>	Home Office guidance
	<a href="#">Sexual violence and sexual harassment between children in schools and colleges</a>	DfE advice
	<a href="#">Serious violence strategy</a>	Home Office Strategy

## 2. Appendix B - recording form for safeguarding concerns

### Record of concern about a child/young person's safety and welfare

Part 1 (for use by any staff – must be handwritten and legible)

Pupil's name:		Date of birth:	Pupil's name:
Date & time of incident:		Date & time (of writing):	
Name (print): .....		Job title:.....	
Signature: .....			
Record the following factually: Nature of concern, e.g. disclosure, change in behaviour, demeanour, appearance, injury, witnesses etc. <i>(please include as much detail in this section as possible. Remember – the quality of your information will inform the level of intervention initiated. Attach additional sheets if necessary. Complete body map if injury/marks seen)</i>			
What is the pupil's perspective?			
Professional opinion, where relevant <i>(how and why might this have happened?)</i>			
Any other relevant information. Previous concerns etc. <i>(distinguish between fact and opinion)</i>			
Note actions, including names of anyone to whom your information was passed and when			

Check to make sure your report is clear to someone else reading it.

**Please pass this form to your DSL without delay**

## Record of concern about a child/young person's safety and welfare

### Part 2 (for use by DSL)

Information received by DSL	Date:	Time completed:	From whom:		
Any advice sought, if applicable	Date:	Time completed:	From: name/organisation:		
	Advice received:				
Action taken with reasons recorded <i>(e.g. MARF completed, monitoring advice given to appropriate staff, CAF etc)</i>	Date:	Time completed:	By whom:		
Outcome	Date:	Time completed:	By whom:		
Parent, carer or social worker informed?	Yes	Who spoken to:	Date:	Parent, carer or social worker informed?	Yes
	No	Detail reason:			
Is any additional detail held, if so where?					
Feedback given? Prior safeguarding history	<input type="checkbox"/> Yes – Who: .....				
	<input type="checkbox"/> No - Reason: .....				
	No of previous records of concern in setting:				
	Has the child been subject of CAF/Early Help assessment?				
	Currently on CP Plan (CPP) / Child in Need Plan (CiN)				
Previously on CP Plan (CPP) / Child in Need Plan (CiN)					
Name of DSL:	Is child known to other agencies?	Y / N			

### 3. Appendix C – Body map

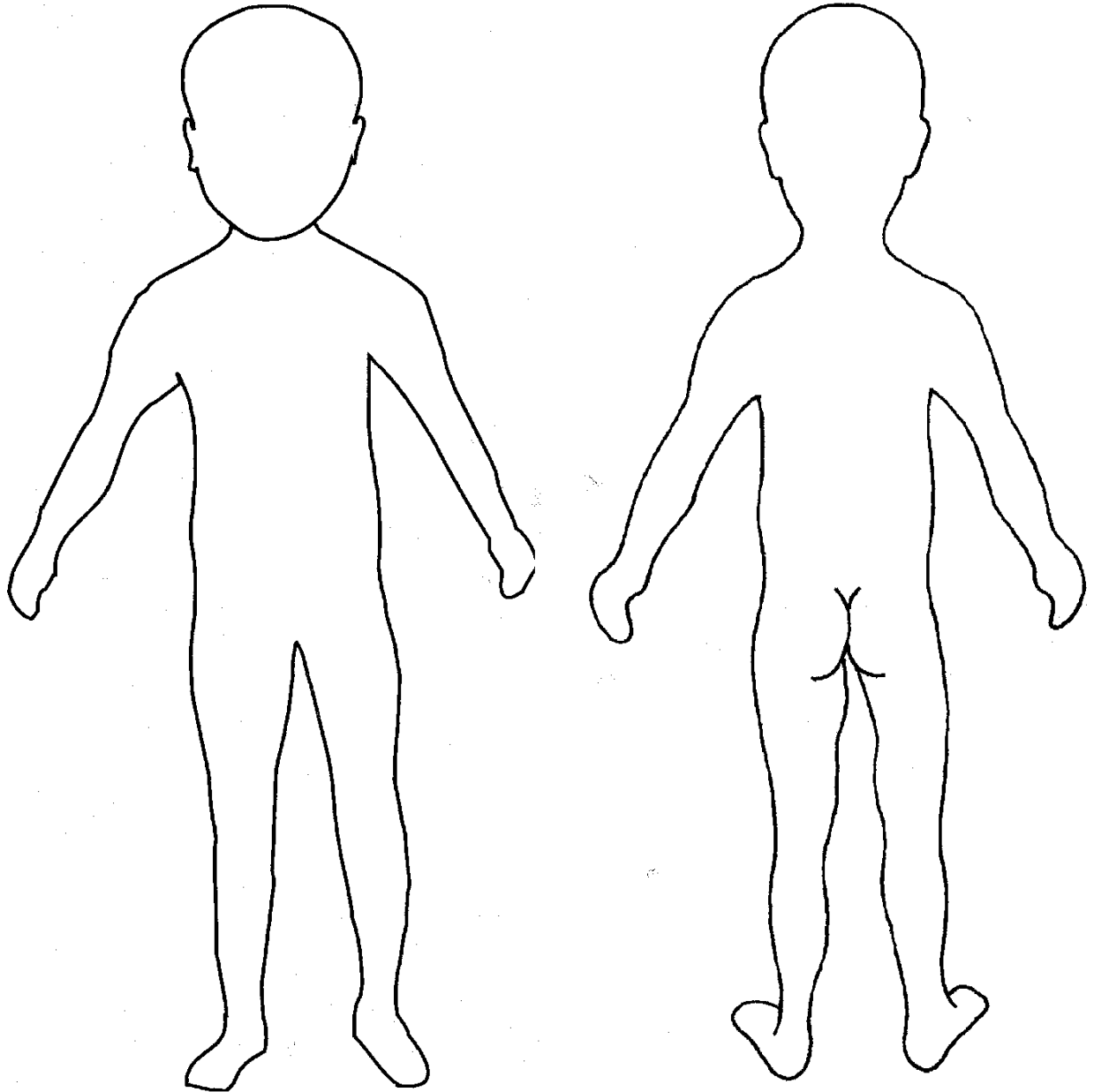
#### BODYMAP

(This must be completed at time of observation)

Name of Pupil: \_\_\_\_\_ Date of Birth: \_\_\_\_\_

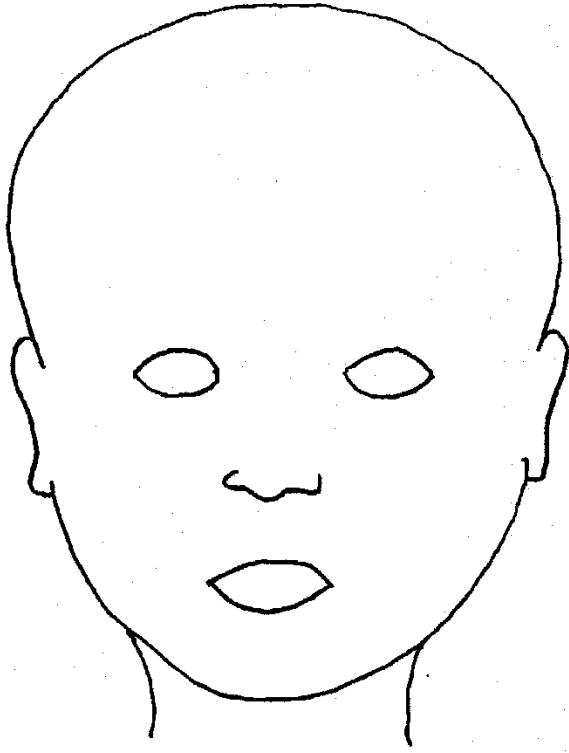
Name of Staff: \_\_\_\_\_ Job title: \_\_\_\_\_

Date and time of observation: \_\_\_\_\_

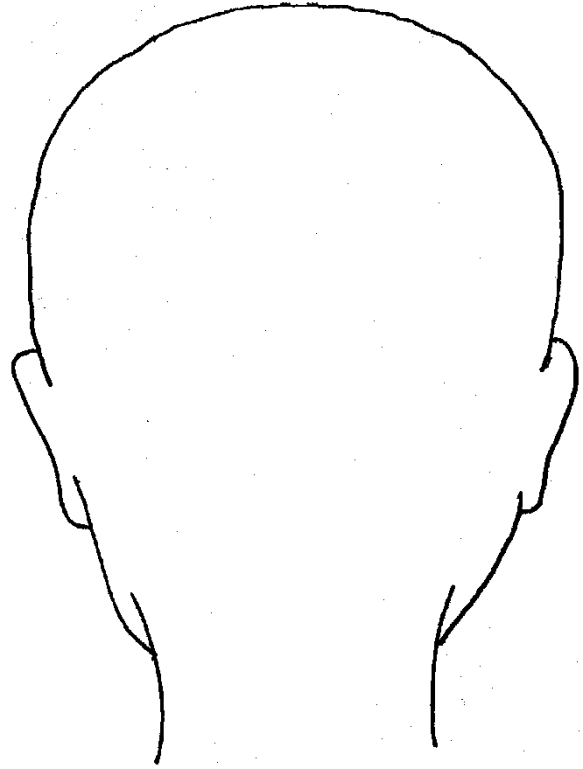


Name of pupil: \_\_\_\_\_ Date and time of observation: \_\_\_\_\_

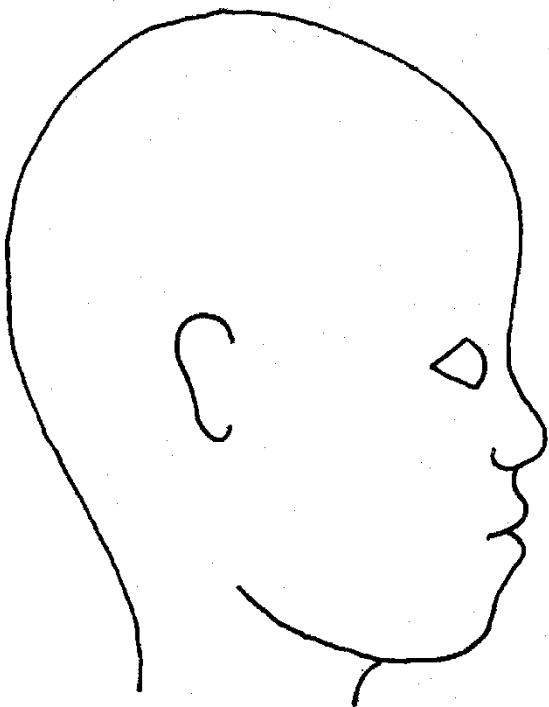




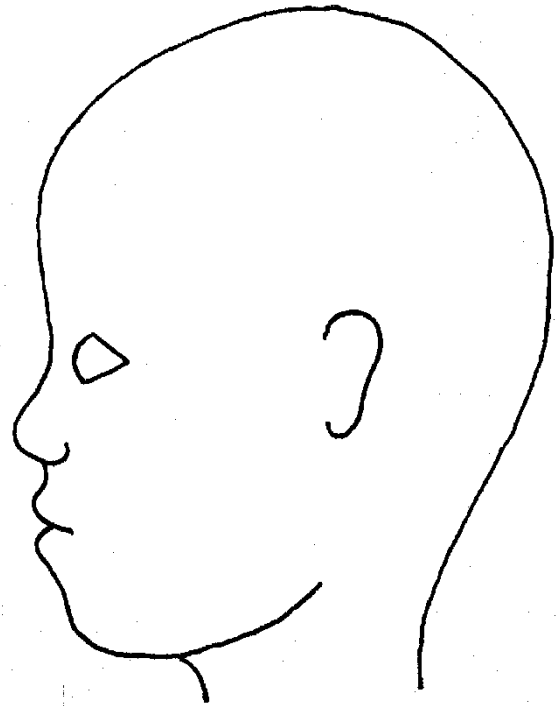
**FRONT**



**BACK**



**RIGHT**



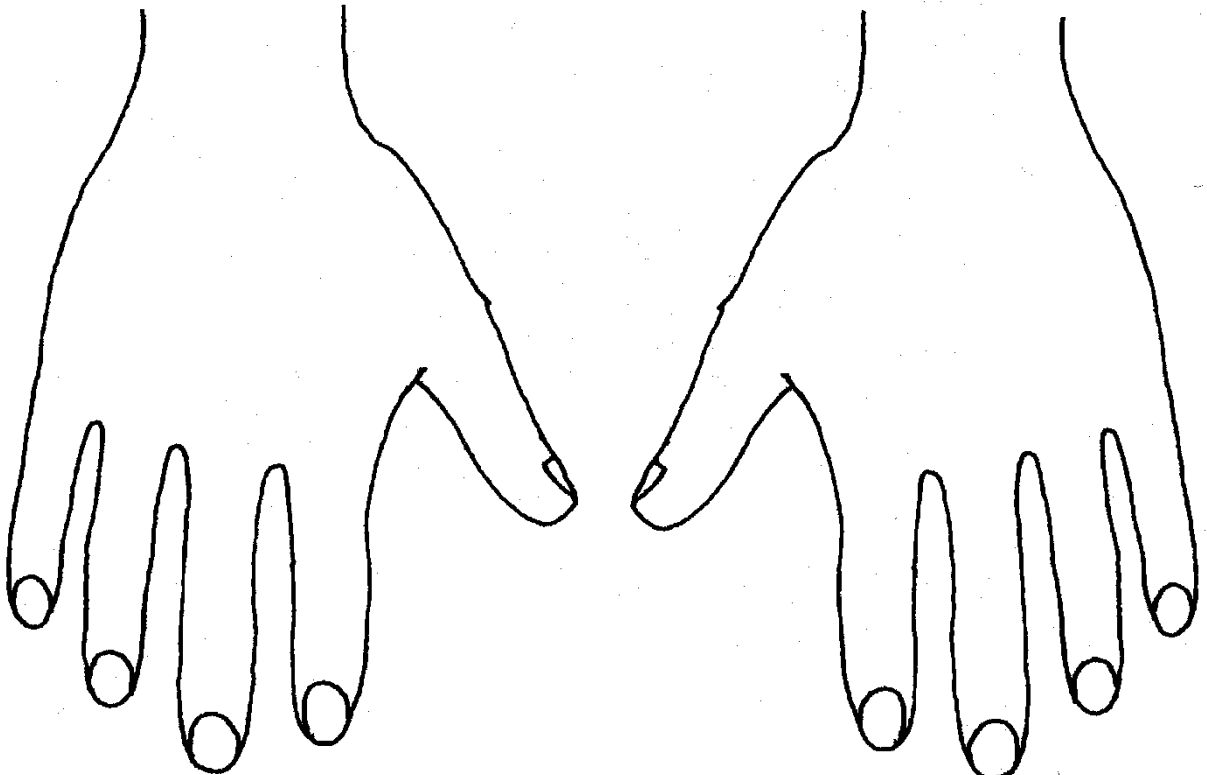
**LEFT**

Name of pupil:

.....

Date and time of observation:

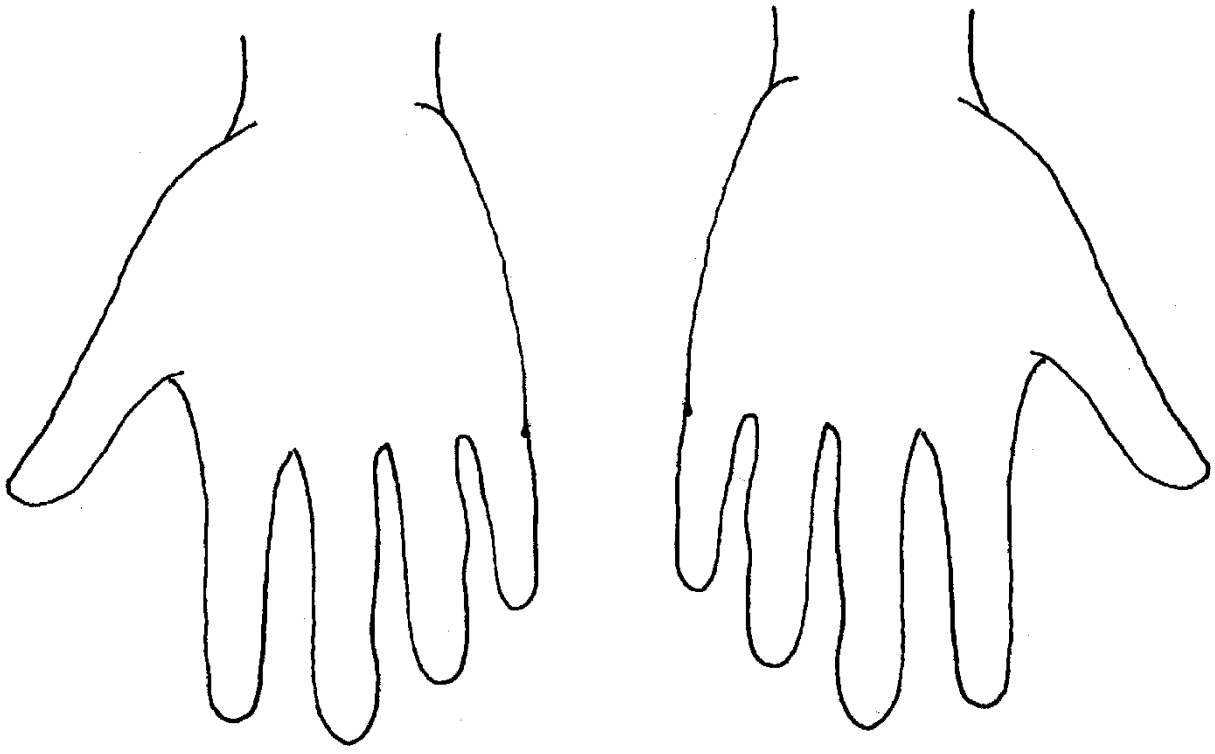
.....



R

L

BACK

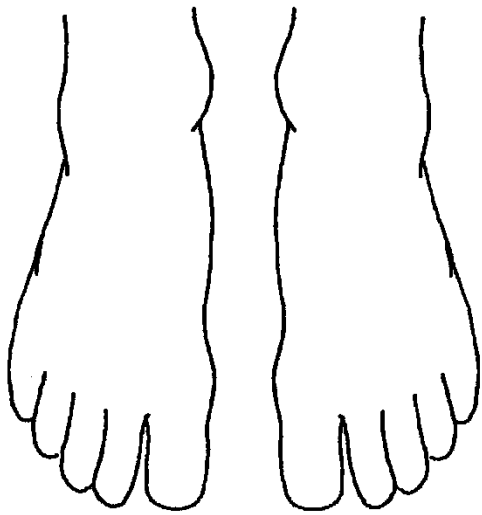


Name of Pupil:

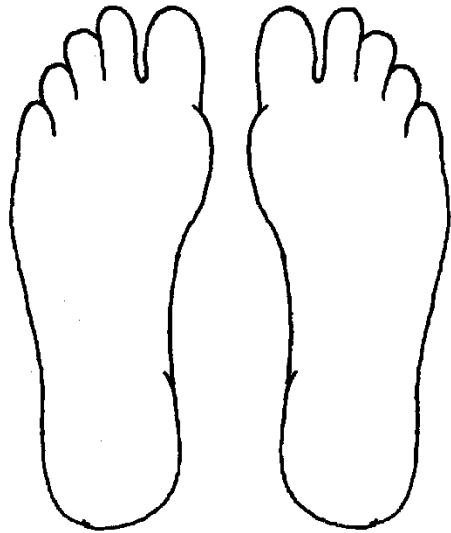
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Date and time of observation:

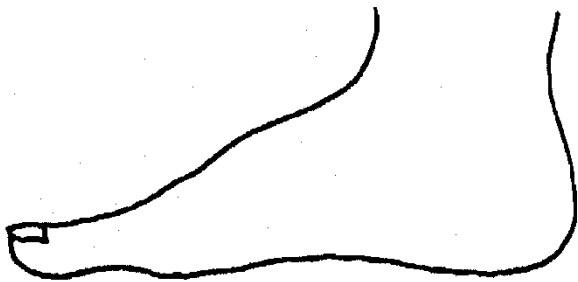
.....



R TOP L



R BOTTOM L

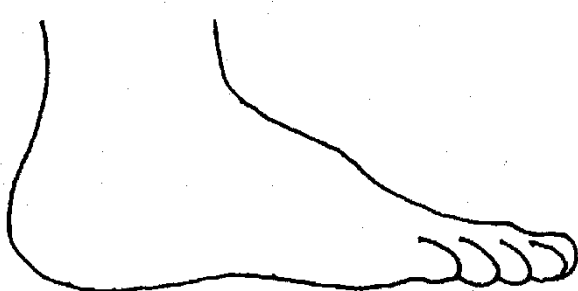


R

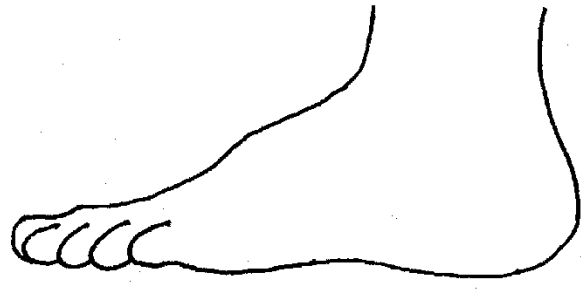


L

INNER



R



L

OUTER

Printed Name,  
Signature and Job  
title of staff:

.....