



## Safeguarding and Child Protection Policy

<b>Reviewed by:</b>	Henrietta Jordan, Regional Schools Director
<b>Date:</b>	1 August 2023
<b>Last reviewed on:</b>	1 August 2022
<b>Next review due by:</b>	1 August 2024
<b>Version control:</b>	2
<b>Approved by:</b>	Tracey Storey, Executive Chair & CEO, Company Strategic Safeguarding Lead

Melrose Education Limited, and its subsidiary schools, recognise their moral and statutory responsibility to safeguard and promote the welfare of all children/learners and expects all staff, members of our governance and school advisory panels, and volunteers to share this commitment. We recognise that all children, regardless of age, disability, SEND, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse (emotional, physical, and sexual) and neglect and follow our procedures to ensure that children receive effective support, protection, and justice. We listen to our children/learners and take seriously what they tell us. Children/learners are aware of the adults they can talk to if they have a concern. When there are concerns for a child/learner's welfare, we may need to share information and work in partnership with other agencies. We will ensure concerns are discussed with parents/carers first unless we have reason to believe that by doing so would be contrary to the child/learner's welfare. This Safeguarding and Child Protection policy underpins and guides our safeguarding procedures and protocols.

## Terminology

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.

Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

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

Child includes everyone under the age of 18 or 25 if a care leaver.

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, adoptive parents, and local authority corporate parents.

## Safeguarding Legislation and Guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- [Education Act 2002 Section 157 \(Independent schools including Academies and CTC's\)](#)
- [The Education \(Independent School Standards\) \(England\) Regulations 2003](#)
- [The Safeguarding Vulnerable Groups Act 2006](#)
- [Teachers' Standards \(Guidance for school leaders, school staff and governing bodies\) July 2011, updated 2013, updated 2021](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education 2022](#)
- [Information Sharing 2018](#)
- [What to do if you're worried a child is being abused 2015](#)
- [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(\[www.gov.uk\]\(http://www.gov.uk\)\)](#)

## Policy Principles, Aims and Values

The welfare of the child is paramount:

- all children regardless of age, gender, culture, language, race, ability, sexual identity, or religion have equal rights to protection, safeguarding and opportunities.
- we recognise that all adults, including temporary staff<sup>1</sup>, volunteers, Directors, and members of our schools' Advisory Panels, all have a duty to protect our

---

<sup>1</sup> Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc. and members of our schools' Advisory Panels.

children/learners from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child/learner is at risk of harm.

- all staff believe that our school should provide a caring, positive, safe, and stimulating environment that promotes the social, physical, mental wellbeing and moral development of the individual child/learner.
- children/learners and staff involved in child protection issues will receive appropriate support and supervision.

**This policy aims to:**

- raise the awareness of all staff of the need to safeguard children/learners.
- provide all staff with guidance on the procedures they should adopt if they suspect a child/learner, young person may be experiencing, or be at risk of experiencing, harm. Including (by DSL/DDSL) consideration to the use of appropriate assessments, resources, and agency support.

**Supporting and Protecting Children:**

- we recognise that a child/learner who is abused or witnesses' violence may feel helpless and humiliated and could experience barriers to making a disclosure. We understand that the behaviour of a child/learner in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn as well as exhibiting signs of mental health problems. We understand the impact on a child/learner's mental health, behaviour, and education from familial and/or contextual abuse. School may not only provide stability in the lives of children/learners who have been abused or who are at risk of harm, but it plays a significant part in the prevention of harm to our children/learners.

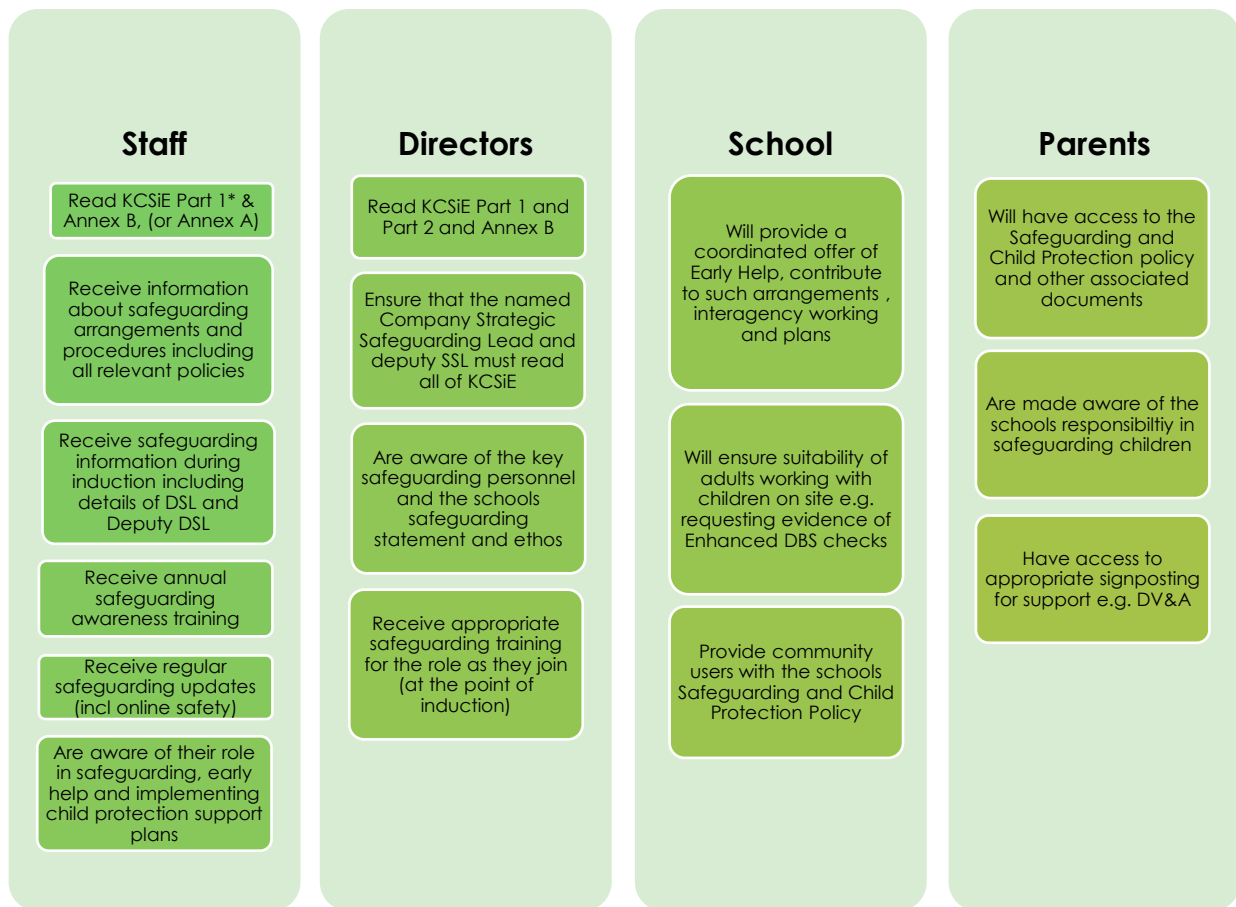
Our schools will support all children by:

- encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying (including cyber bullying).
- promoting a caring, safe, and positive environment within the school and providing children/learners with good lines of communication with trusted adults, supportive friends, and an ethos of protection.
- responding sympathetically to any requests for time out to deal with distress and anxiety.
- offering details of helplines, counselling, or other avenues of external support.
- liaising and working together with all other settings/schools, support services and those agencies involved in the safeguarding of children.
- notifying Children's Social Care as soon as there is a significant concern.
- ensuring appropriate information is shared confidentially at key transition points in a child/learner's journey to ensure continued support (including school medical records).
- Ensuring children/learners are taught to understand and manage risk through our Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of school life. This includes online safety.
- accessing and using the necessary resources, guidance, and toolkits to support the identification of children/learners requiring mental health support, support services and assessments.
- reassuring victims that they are being taken seriously and that they will be supported and kept safe.

The school community will protect children by:

- working to establish and maintain an ethos where children/learners feel secure, are encouraged to talk, and are always listened to.
- ensuring that all children/learners know there are adults in the school whom they can approach if they are worried or in difficulty.
- including regular consultation with children/learners, parents, and staff, gathering their voice.
- including safeguarding across the curriculum to equip children/learners with the skills they need to stay safe from harm and to know to whom they should turn for help; in particular this will include anti-bullying work, information about child on child abuse (sexual harassment and sexual violence, consent), online-safety, road safety, pedestrian and cycle training; provide focused activities to prepare key year groups for transition to new settings and/or key stages e.g. more personal safety/independent travel; and
- ensuring all staff, children/learners and parents are aware of school guidance and the safeguarding issues around the use of mobile technology, including the use of social media and their associated risks.

## Safe Schools, Safe Staff



### Roles and Responsibilities

We will follow the statutory guidance as set out in the latest Keeping Children Safe in Education (and associated documents and guidance), adhering to the roles, responsibilities and expectations identified for:

- directors, proprietors, and advisory panels
- the principal and senior leadership team
- the designated safeguarding leads
- the deputy designated safeguarding lead/s
- staff

### [Keeping Children Safe in Education \(part 1\)](#)

#### Directors

Directors understand and fulfil their responsibilities, namely, to ensure that there is a Safeguarding and Child Protection policy together with a Code of Conduct and Behaviour Policy for staff.

Directors ensure that all members of the schools advisory panels receive appropriate safeguarding and child protection (including online) training. This training will equip the members of the schools advisory panels with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our schools are effective. This will support the delivery of a

robust whole school approach to safeguarding. The Directors will ensure that the training for those in governance roles will be regularly updated, at least annually.

Roles and responsibilities will include:

- ensuring that child protection, safeguarding, recruitment and managing allegations policies and procedures, including the Code of Conduct and Behaviour Policy (staff), are consistent with the Local Authority and statutory requirements, are reviewed annually and that the Safeguarding and Child Protection policy is publicly available on the schools' websites or by other means.
- ensuring that all staff, including temporary staff and volunteers, are provided with the school's Safeguarding and Child Protection policy and Code of Conduct and Behaviour Policy (staff).
- ensuring all staff have read Keeping Children Safe in Education Part 1\* and Annex B and that there are mechanisms in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance. (\*or Annex A if not working directly with children).
- ensuring that our schools operate a safer recruitment procedure that includes statutory checks on staff, disqualification by association regulations and by ensuring that there is at least one person involved in the recruitment process who has completed safer recruitment training.
- ensuring that our schools have procedures for dealing with allegations of abuse against staff (including the principal), supply staff, volunteers and against other children/learners.
- ensuring that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.
- ensuring that the Company's Strategic Safeguarding Lead, is nominated to liaise with the Local Authority on Child Protection issues in the event of an allegation of abuse made against the principal.
- ensuring that a member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding.
- ensuring that the nominated DSL and any deputy(ies) receive training to provide them with the knowledge and skills required to carry out the role.
- ensuring all other staff have safeguarding training updated as appropriate; but at least annually.
- ensuring that at least one member of the Board of Directors has completed safer recruitment training to be refreshed every two years.
- ensuring that children/learners are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues to meet their needs including those who have recognised vulnerabilities.
- ensuring that appropriate safeguarding responses are in place for children/learners who go missing from education.
- ensuring that appropriate online filtering and monitoring systems are in place.
- ensuring that Enhanced DBS checks are in place for all Directors.
- ensuring that any weaknesses in child protection identified, are remedied immediately.

## **The Principal**

The principal will support the Directors, members of the schools' advisory panels, designated safeguarding lead, deputy designated safeguarding leads, staff, and volunteers to fulfil their roles and responsibilities.

Roles and responsibilities will include:

- ensuring the Safeguarding and Child Protection policy and procedures are implemented and followed by all staff.
- enabling sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) DSL(s) to conduct their roles effectively.
- supporting and promoting a safeguarding culture and ethos in school so that child/ren's wishes and feelings are considered when determining what action to take and what services to provide.
- ensuring systems are in place for children/learners to express their views and give feedback.
- adhering to the whistleblowing policy and procedures if an allegation is made against a member of staff, supply staff or volunteer, including liaising with the Local Authority Designated Officer (LADO) and referring anyone who has harmed or may pose a risk to a child to the Disclosure and Barring Service.
- ensuring that children/learners are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

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

The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety). This is explicit in the role holder's job description/role analysis.

Roles and responsibilities will include:

- being available during school hours.
- managing referrals to Children's Social Care, Channel programme, disclosure and barring service, the police, and other professional partners.
- working with others e.g., a point of contact with safeguarding partners, a source of support and advice for staff, to promote supportive engagement with parents and/or carers and the SLT/Board of Directors.
- attending CP, CIN, and LAC review meetings.
- sharing information and managing child protection files.
- raising safeguarding and child protection awareness.
- updating training, knowledge and skills required to carry out the role of DSL.
- providing support, advice, and guidance to staff.
- interpreting and analysing data.
- knowing which children/learners are on multi-agency plans and which children/learners have a social worker.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and

responsibilities around filtering and monitoring as part of safeguarding training.

- Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

### **The Deputy Designated Safeguarding Lead/s (DDSL)**

The DDSL is trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of children/learners. In the event of the long-term absence of the DSL the deputy will assume all the responsibilities above.

- whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead. This lead responsibility should not be delegated.

### **All Staff**

Roles and responsibilities will include:

- maintaining an attitude of 'it could happen here' where safeguarding is concerned. Thinking the unthinkable.
- identifying concerns early, providing help for children/learners, promoting children/learner's welfare, and preventing concerns from escalating.
- providing a safe environment in which children/learners can flourish.
- knowing what to do if a child/learner tells them they are being abused, exploited, or neglected.
- being able to reassure victims that they are being taken seriously and that they will be supported and kept safe.
- recognising the barriers for children/learners when wanting to make a disclosure (verbal or non-verbal).
- identifying children/learners who may benefit from early help, (providing support as soon as a problem emerges) and the part they play in these support plans.
- raising any concerns for a child/learner following the schools safeguarding policies and procedures
- being aware of local authority referral processes and supporting social workers and other agencies following any referral.
- adhering to Teachers' Standards 2012 - that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- being aware of systems within school which support safeguarding e.g., safeguarding policies and procedures, behaviour policy, code of conduct, CME, PMOE, AIE.
- attending regular safeguarding and child protection training.
- recognising that children missing education can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.
- reading and understanding Part One, Part Five and Annexe B of Keeping Children Safe in Education.



## Confidentiality

- our schools recognise that to effectively meet a child/learner's needs, safeguard their welfare, and protect them from harm the schools must contribute to inter-agency working in line with Working Together to Safeguard Children (2018) and share information between professionals and agencies where there are concerns.
- all staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children and that the Data Protection Act 2018<sup>2</sup> and GDPR is not a barrier to sharing information where the failure to do so would place a child at risk of harm.
- all staff must be aware that they cannot promise a child/learner to keep secrets which might compromise the child/learner's safety or wellbeing.
- however, we also recognise that all matters relating to child protection are personal to children/learners and families. Therefore, in this respect they are confidential, and the Principal or DSLs will only disclose information about a child/learner to other members of staff on a need-to-know basis.
- we will always undertake to share our intention to refer a child/learner to the Local Authority Safeguarding team with their parents/carers unless to do so could put the child/learner at greater risk of harm or impede a criminal investigation. If in doubt, we will contact the Local Authority Safeguarding team.
- in line with KCSiE, all children/learner's safeguarding files will be kept confidential and stored securely. Safeguarding files will be kept separate from children/learners' schools' files.
- Archiving system to be implemented to comply with all safeguarding and GDPR legislation.

## Recognising and Responding to Safeguarding Concerns

### Recognising:

Any child, in any family, in any school, could become a victim of abuse. Staff should always maintain an attitude of **“it could happen here”** and **“think the unthinkable.”** We also recognise that abuse, neglect, and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

- abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- abuse and neglect may also take place outside of the home, contextual safeguarding, and this may include (but is not limited to), sexual exploitation criminal exploitation, serious youth violence, radicalisation.
- staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and sharing of nudes/semi-nude images/videos (sexting) put children in

---

<sup>2</sup> The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998.

danger and that safeguarding issues can manifest themselves via child-on-child abuse.

Further information about the four main categories of abuse; physical, emotional, sexual and neglect, (familial and contextual) and indicators that a child may be being abused can be found in the appendices of this policy and in Keeping Children Safe in Education Part 1/Annex A/Annex B. There are also a number of specific safeguarding concerns that we recognise our children/learners may experience.

- child absent in education
- child missing from education
- child missing from home or care
- child sexual exploitation (CSE)
- child criminal exploitation (CCE)
- bullying including cyberbullying
- domestic abuse
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health difficulties
- radicalisation
- youth produced sexual imagery (sexting)
- teenage relationship abuse
- trafficking
- child on child abuse
- up skirting
- serious violence
- sexual harassment

There will be occasions when staff may suspect that a child/learner may be at risk but have no 'real' evidence. The child/learner's behaviour may have changed, their artwork could be bizarre, and they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed.

We recognise that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill, or an accident has occurred, a private fostering arrangement may have been made. However, they may also indicate a child is being abused or needs safeguarding.

In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the child/learner if they are OK or if they can help in any way.

Further information on the different types of safeguarding concerns and schools' response can be found in the appendices section of this policy.

Appendix 1. Categories of Abuse
Appendix 2. Anti-Bullying / Cyberbullying
Appendix 3. Racist Incidents
Appendix 4. Radicalisation and Extremism
Appendix 5. Domestic Abuse (including Operation Encompass)
Appendix 6. Exploitation (including CSE, CCE and County Lines)
Appendix 7. Female Genital Mutilation
Appendix 8. Forced Marriage
Appendix 9. Honour Based Abuse
Appendix 10. One Chance Rule
Appendix 11. Mental Health Difficulties
Appendix 12. Private Fostering Arrangements
Appendix 13. Looked After Children and Previously Looked After Children
Appendix 14. Children Missing Education
Appendix 15. Child on Child Abuse (including Sexual Violence, Sexual Harassment and HSB)
Appendix 16. Online Safety
Appendix 17. Youth Produced Sexual Imagery (Sexting)
Appendix 18. Additional Resources

## Responding

- following an initial conversation with the child/learner, if the member of staff remains concerned, they should discuss this with the DSL and put them in writing, see **FLOW CHART A**.
- records should include:
  - a clear and comprehensive summary of the concern.
  - details of how the concern was followed up and resolved.
  - a note of any action taken, decisions reached and the outcome.
- notes should be kept in school (confidentially and filed securely) or recorded on the record keeping system the school uses, i.e., CPOMS
- if the child/learner does begin to reveal that they are being harmed or are at risk of being harmed, staff should follow the advice in **FLOW CHART A** and in the table below 'child/learner making a disclosure.'
- all concerns, however small, must be recorded and shared with the DSL as this information could provide the 'missing' piece of the bigger picture of the lived experience for the child/learner.

## FLOW CHART A



### **If a Child/Learner Makes a Disclosure to a Member of Staff**

- we recognise that it takes a lot of courage for a child/learner to disclose they are being abused. They may feel ashamed, guilty, or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.
- a child/learner who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

### **During their conversation with the child/learner, staff will:**

- listen to what the child/learner has to say and allow them to speak freely – use the TED process (tell, explain, describe)
- remain calm and not overact or act shocked or disgusted – the child/learner may stop talking if they feel they are upsetting the listener.
- reassure the child/learner that it is not their fault and that they have done the right thing in telling someone.
- not be afraid of silences – staff must remember how difficult it is for the child/learner and allow them time to talk.
- take what the child/learner is disclosing seriously.
- ask open questions and avoid asking leading questions.
- avoid jumping to conclusions, speculation or make accusations.
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child/learner who is being abused.

- avoid admonishing the child/learner for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child/learner to mean they have done something wrong.
- tell the child/learner what will happen next, that they cannot keep secrets and that information will be shared to ensure the right level of support is given.

### **Notifying Parents**

- the school will normally seek to discuss any concerns about a child/learner with their parents. This must be handled sensitively and normally the DSL/DDSL will contact the parent in the event of a concern, suspicion, or disclosure of abuse of that the child/learner has been harmed in some way.
- however, if the school believes that notifying parents could increase the risk to the child/learner or exacerbate the problem, advice will first be sought from the Local Authority Safeguarding team e.g., familial sexual abuse.
- where there are concerns about forced marriage or honour-based abuse, parents should not be informed a referral is being made as to do so may place the child/learner at a significantly increased risk. In some circumstances it would be appropriate to contact the police.

### **Making a Referral**

Concerns about a child/learner or a disclosure should be immediately raised with the DSL who will help decide whether a referral to the Local Authority Safeguarding team in accordance with the school's Local Authority Threshold Tool<sup>3</sup>.

- if the DSL is uncertain about whether a concern raised should be referred to the Local Authority Safeguarding team, advice will be sought. This will determine if this is an early help referral or a multi-agency referral.
- if a referral is needed, the DSL should make this rapidly and have the necessary systems in place to enable this to happen. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one has not been made, they can, and should, consider making a referral themselves.
- the child/learner (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child/learner.
- if after a referral the child/learner's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child/learner's situation improves. They must escalate their concerns within the partner agency's hierarchy.
- if a child/learner is in immediate danger or is at risk of harm a referral should be made to the Local Authority Safeguarding team and/or the police immediately. Anybody can make a referral.
- where referrals are not made by the DSL, the DSL should be informed as soon as possible.

---

<sup>3</sup> The school's Local Authority Threshold Document should be appended to the School's Child Protection Information Sheet

### **Supporting our Staff**

- we recognise that staff working in the school who have become involved with a child/learner who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
- we will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.
- All staff will be provided with the relevant supervision and support.

### **Children Who Are Particularly Vulnerable**

Our schools recognise that some children/learners are more vulnerable to abuse, neglect and contextual safeguarding concerns and that additional barriers exist when recognising abuse for some children/learners. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment, or circumstances.

In some cases, indicators of abuse such as a child/learner's mood, behaviour or injury might be assumed to relate to the child/learner's impairment or disability rather than giving a cause for concern. Or a focus may be on the child/learner's disability, special educational needs, or situation without consideration of the full picture. In other cases, such as bullying, the child/learner may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children/learners may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

Any child/learner may benefit from early help or may need, safe space to speak out, but all school staff should be particularly alert to the potential need for early help, for a child/learner who:

- is disabled and has specific additional needs.
- has special educational needs (whether they have a statutory education, health, and care plan).
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- is frequently missing/goes missing from care or from home or from school.
- is misusing drugs or alcohol themselves.
- is at risk of modern slavery, trafficking, or exploitation.
- is in a family circumstance presenting challenges for the child/learner, such as substance abuse, adult mental health problems or domestic abuse.
- has returned home to their family from care.
- is showing early signs of abuse and/or neglect.
- is at risk of being radicalised or exploited.
- is a privately fostered child.
- has an imprisoned parent.
- is or are perceived to be LGBTQ+.
- is experiencing mental health and/or wellbeing difficulties.

- is persistently absent from education (including persistently absent for part of the school day).
- is at risk of 'honour' based abuse such as FGM or Forced Marriage.

### **Whistleblowing**

We recognise that children/learners cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Local Authority Safeguarding team and follow the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285. This line is available from 8.00 a.m. to 8.00 p.m., Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistleblowing about the principal should be made to the Company Strategic Safeguarding Lead whose contact details are readily available to staff via the individual school child protection information sheet and safeguarding posters displayed in and around the school.

### **Allegations Against Staff**

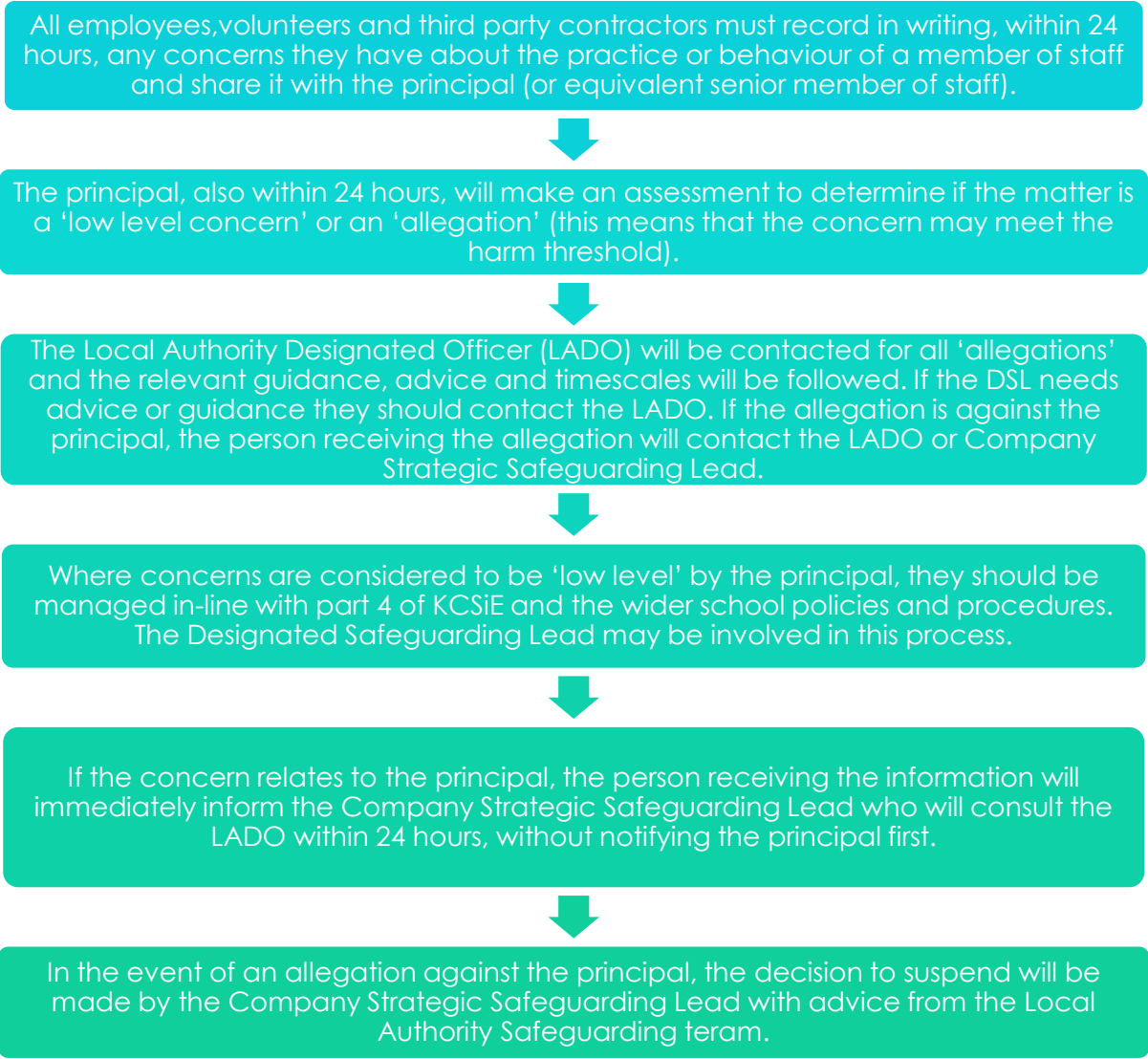
All school staff including third party contractors and volunteers should take care not to place themselves in a vulnerable position with a child/learner. It is always advisable for interviews or work with individual children/learners or parents to be conducted in view of other adults. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction<sup>4</sup>. In line with KCSiE part 4 guidelines.

Please see flowchart below. Please also note that we will always be guided by the LADO's advice and instructions. Where the LADO makes a determination, we will abide by their decision and recommendations in full. For example, if the LADO makes a "substantiated" decision this may involve disciplinary, dismissal, referring to the DBS (disclosure and barring service) and/or the teachers' reference agency (TRA).

- Substantiated
- Malicious
- False
- Unfounded
- Unsubstantiated

---

<sup>4</sup> Refer to "Guidance for Safe Working Practice"



Suspension of the member of staff, excluding the principal, against whom an allegation has been made, needs careful consideration, and the principal will seek the advice of the LADO and the Company Strategic Safeguarding Lead before making this decision.

Staff, parents, and Directors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

### **Concerns that do not Meet the Harm Threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold set out in section 1 above.



- Concerns may arise through, for example:
- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.
- Examples of such behaviour could include, but are not limited to:
  - Being overly friendly with children
  - Having favourites
  - Taking photographs of children on their mobile phone
  - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - Humiliating learners

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

### **Responding to low-level concerns**

If the concern is raised via a third party, the principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual involved and any witnesses.

The principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The

principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

[Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

### **Record Keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

### **Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child/learner is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

Such events should be recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained.

We understand that physical intervention of a nature which causes injury or distress to a child/learner may be considered under child protection or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children/learners, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

Further information can be found in our Behaviour Policy and here [Use of reasonable force in schools - GOV.UK \(www.gov.uk\)](#)

## **Confidentiality, Sharing Information and GDPR**

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child/learner and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should be proactive in sharing as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children/learners, whether this is when problems are first emerging, or where a child/learner is already known to local authority children/learner's social care.

Staff should only discuss concerns with the DSL, Principal or Company Strategic Safeguarding Lead (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, Keeping Children Safe in Education emphasises that any member of staff can contact children's social care if they are concerned about a child/learner.

Child protection information will be stored and handled in line with the Data Protection Act 2018 <sup>5</sup> and HM Government Information Sharing and Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018. School will consider where appropriate information sharing prior to the child/learner's formal transfer to their new setting, this could also include key staff from their new setting/school to be invited to meetings e.g., child protection, core group or Team Around a Family (with consent of parents and professionals).

At the point a child/learner formally transfers to their new setting/school, their safeguarding file will be transferred securely in line with GDPR expectations as soon as possible, but within 5 working days. Information sharing is guided by the following principles:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Our schools ensure that images of children used within publications, publicity and on the website have written parental consent prior to any images being taken and used. This consent will be obtained in line with school's annual data collection process.

---

<sup>5</sup> The UK Data Protection Act 2018 (DPA 2018) is supplementary to the General Data Protection Regulation 2016 (the GDPR) and replaces DPA 1998.

## **Policy Links**

This Safeguarding and Child Protection policy also links to our policies on:

- behaviour (learners)
- code of conduct and behaviour (staff)
- whistleblowing
- anti-bullying
- health and safety
- allegations of abuse against staff
- complaints
- attendance
- curriculum
- PSHE
- RSE (relations and sex education)
- medications
- substance abuse
- physical intervention
- online safety (e-safety), including staff use of mobile phones
- risk management and risk assessment
- safer recruitment
- data protection/GDPR

## Appendix 1

### Categories of Abuse:

- physical abuse
- emotional abuse (including domestic abuse)
- sexual abuse (including child sexual exploitation)
- neglect

### Signs of Abuse in Children:

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

- significant change in behaviour
- extreme anger or sadness
- aggressive and attention-needing behaviour
- suspicious bruises with unsatisfactory explanations
- lack of self-esteem
- self-injury
- depression and/or anxiousness
- age-inappropriate sexual behaviour
- child sexual exploitation
- criminality
- substance abuse
- mental health problems
- poor attendance

### Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- must be regarded as indicators of the possibility of significant harm
- justifies the need for careful assessment and discussion with designated/named/lead person, principal, (or in the absence of all those individuals, an experienced colleague)
- may require consultation with and/or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- appear frightened of the parent/s
- act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- persistently avoid child health promotion services and treatment of the child's episodic illnesses
- have unrealistic expectations of the child
- frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- be absent or misusing substances

- persistently refuse to allow access on home visits
- be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

### **Recognising Physical Abuse**

The following are often regarded as indicators of concern:

- an explanation which is inconsistent with an injury
- several different explanations provided for an injury
- unexplained delay in seeking treatment
- the parents/carers are uninterested or undisturbed by an accident or injury
- parents are absent without good reason when their child is presented for treatment
- repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- family use of different doctors and A&E departments
- reluctance to give information or mention previous injuries

### **Bruising**

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- bruising in or around the mouth, which may indicate force feeding
- two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- variation in colour indicating injuries caused at different times
- the outline of an object used e.g., belt marks, handprints, or a hairbrush
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- bruising around the face
- grasp marks on small children
- bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Mongolian Blue Spot: Bruising in non-mobile children is rare and may indicate abuse or neglect. Birth marks, especially Mongolian Blue Spots, can mimic bruising. Mongolian Blue Spot can be identified (see below), however if in any doubt as to the cause of the bruise refer to your local authority's child protection procedures.

- areas of skin hyperpigmentation – flat, not raised, swollen, or inflamed
- not painful to touch
- usually present at birth/ develop soon afterwards
- will not change in shape or colour within a few days
- normally uniform blue/ grey in colour across the mark
- common in African, Middle Eastern, Mediterranean, and Asian children
- while most occur at the lower back and buttocks, they can appear anywhere (e.g., back of shoulder or limb), scalp/ face rarely affected
- can be single/ multiple, vary in size, but mostly few centimetres diameter
- gradually fade over many years

## **Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

## **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- linear burns from hot metal rods or electrical fire elements
- burns of uniform depth over a large area
- scalds that have a line indicating immersion or poured liquid (a child getting into hot water of his/her own accord will struggle to get out and cause splash marks)
- old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation
- scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath

## **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- the history provided is vague, non-existent, or inconsistent with the fracture type
- there are associated old fractures
- medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- there is an unexplained fracture in the first year of life

## **Scars**

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

## **Recognising Emotional Abuse**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse. The following may be indicators of emotional abuse:

- developmental delay
- abnormal attachment between a child and parent/carer e.g., anxious, indiscriminate, or not attachment
- indiscriminate attachment or failure to attach
- aggressive behaviour towards others
- scapegoated within the family

- frozen watchfulness, particularly in pre-school children
- low self-esteem and lack of confidence
- withdrawn or seen as a “loner” – difficulty relating to others

### **Recognising Signs of Sexual Abuse**

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about, and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- inappropriate sexualised conduct
- sexually explicit behaviour, play or conversation, inappropriate to the child's age
- continual and inappropriate or excessive masturbation
- self-harm (including eating disorders), self-mutilation and suicide attempts
- involvement in prostitution or indiscriminate choice of sexual partners
- an anxious unwillingness to remove clothes e.g., for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- pain or itching of genital area
- blood on underclothes
- pregnancy in a younger girl where the identity of the father is not disclosed
- physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia, or clothing

### **Recognising Neglect**

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- failure by parents or carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene, and medical care
- a child seen to be listless, apathetic, and unresponsive with no apparent medical cause
- failure of child to grow within normal expected pattern, with accompanying weight loss
- child thrives away from home environment
- child frequently absent from school
- child left with adults who are intoxicated or violent
- child abandoned or left alone for excessive periods



## **Appendix 2**

### **Anti-Bullying/Cyberbullying**

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g., cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the Directors. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the principal and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

## **Appendix 3**

### **Racist Incidents**

Our policy on racist incidents is set out separately in our Equality, Diversity and Inclusion Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents and report them to the Local Authority.

## Appendix 4

### Radicalisation and Extremism

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

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

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal, or dangerous.

Our schools are clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism<sup>6</sup>.

Our schools seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Our staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed below.

Opportunities are provided in the curriculum to enable children/learners to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social, and cultural education) in Schools (2014)<sup>7</sup>.

The Directors, the principals, and the Designated Safeguarding Leads (DSLs) will assess the level of risk within the schools and put actions in place to reduce that risk. Risk assessment may include the use of school premises by external agencies, relevant school policies, and other issues specific to the school's profile, community, and philosophy.

When any member of staff has concerns that a child/learner may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent, then the Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and those responsible for governance, to raise concerns around Prevent (020 7340 7264).

---

<sup>6</sup> [The Prevent duty](#)

<sup>7</sup> [Promoting Fundamental British Values](#)

## **Indicators Of Vulnerability to Radicalisation**

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:  
*vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.*
3. Extremism is defined by the Crown Prosecution Service as:  
The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - encourage, justify, or glorify terrorist violence in furtherance of particular beliefs.
  - seek to provoke others to terrorist acts.
  - encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - foster hatred which might lead to inter-community violence in the UK.

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

Children/learners may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff can recognise those vulnerabilities.

### **Indicators of Vulnerability include:**

- identity crisis – the child/learner is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- personal crisis – the child/learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- personal circumstances – migration; local community tensions; and events affecting the child/learner country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- unmet aspirations – the child/learner may have perceptions of injustice; a feeling of failure; rejection of civic life.
- experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- special educational need – children/learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- being in contact with extremist recruiters.
- accessing violent extremist websites, especially those with a social networking element.
- possessing or accessing violent extremist literature.
- using extremist narratives and a global ideology to explain personal disadvantage.
- justifying the use of violence to solve societal issues.
- joining or seeking to join extremist organisations; and
- significant changes to appearance and/or behaviour.
- experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

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

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

[The Prevent Duty can be accessed via this link.](#) (school specific paragraphs 57-76.)

[Summary of The Prevent Duty for Schools and Childcare Providers \(June 2015\)](#)

[The Prevent Duty, for Further Education Institutions](#)

Guidance on Channel <https://www.gov.uk/government/publications/channel-guidance>

Further information can be obtained from the Home Office website.

## **Appendix 5**

### **Domestic Abuse (including Operation Encompass)**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological, or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, and religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

How does it affect children?

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That 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. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse are at risk of significant harm.

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed, and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

What should I do if I suspect a family is affected by domestic abuse?

Please refer to the school's individual Safeguarding Contact Information page.

### **Operation Encompass**

Operation Encompass helps police and schools work together to provide emotional and practical help for children. Police will inform the 'key adult' within school if they have been called to an incident of domestic abuse where there are children in the household, before registration the next day.

## Appendix 6

### **Exploitation (including Child Sex Exploitation, Child Criminal Exploitation and County Lines)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance could be due to age, gender, sexual identity, cognitive ability, physical strength, status, and /or access to economic or other resources. The abuse could be linked to an exchange for something the victim perceives that they need or want and/or will be to the financial benefit or other advantage (such as increase status) of the perpetrator or facilitator.

The abuse can be perpetrated by individuals or groups, males or females, and adults or children (who themselves may be experiencing exploitation). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It may involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Victims can be exploited even when the activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls who are criminally exploited can be quite different from boys, the indicators may not be the same and both boys and girls that are being criminally exploited may be at higher risk of sexual exploitation.

Any concerns that a child is being or is at risk of being sexually or criminally exploited should be passed without delay to the DSL. We are aware there is a clear link between regular school absence/truanting, CSE and CCE. Staff should consider a child to be at potential CSE/CCE risk in the case of regular school absence/truanting and make reasonable enquiries with the child and parents to assess this risk.

The DSL will use the appropriate Local Authority Assessment tool on all occasions when there is a concern that a child is being or is at risk of being sexually or criminally exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually or criminally exploited.

In all cases if the assessment identified any level of concern the DSL should contact their local MACE<sup>8</sup> (Missing and Child Exploitation) and email the completed assessment and other associated paperwork, as required. If a child is in immediate danger the police should be called on 999.

Our schools are aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. Consequently, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Our schools include the risks of sexual and criminal exploitation in the PHSE and RSE curriculum. Children/learners will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They

---

<sup>8</sup> Local Authority Specific MACE guidance should be appended to the individual School Child Protection Information Sheet

will be supported in terms of recognising and assessing risk in relation to CSE/CCE, including online, and knowing how and where to get help.

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

Signs include:

- going missing from home or school
- regular school absence/truancy
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- calling older children or adults their boyfriend or girlfriend
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.



Child Criminal Exploitation 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

County lines is a term used to describe gangs and organised criminal networks involved in the exporting of illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of 'deal line.'

Exploitation is an integral part of the county lines offending model with children and vulnerable adults being exploited to move (and store) drugs and money. The same grooming models used to coerce, intimidate, and abuse individuals for sexual and criminal exploitation are also used for grooming vulnerable individuals for county lines.

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence. 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.

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 watching sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

**For further information on signs of a child's involvement in sexual exploitation:** [Child sexual exploitation: guide for practitioners](#)

**For further information on County Lines:** [Criminal exploitation of children and vulnerable adults: county lines guidance](#)

## Appendix 7

### Female Genital Mutilation (FGM)

We ensure our staff are aware of FGM practices and the need to look for signs, symptoms, and other indicators of FGM. If a member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out, the member of staff must report this to the Police.

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

Section 5B of the 2003 Act<sup>1</sup> introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

### What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

### 4 types of procedure:

Type 1 - clitoridectomy – partial/total removal of clitoris

Type 2 - excision – partial/total removal of clitoris and labia minora

Type 3 - infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 - all other procedures that may include: pricking, piercing, incising, cauterising, and scraping the genital area.

### Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- preserves a girl's virginity
- part of being a woman/rite of passage
- upholds family honour
- cleanses and purifies the girl
- gives a sense of belonging to the community
- fulfils a religious requirement
- perpetuates a custom/tradition
- helps girls be clean / hygienic
- is cosmetically desirable
- mistakenly believed to make childbirth easier

### Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police<sup>9</sup>.

---

<sup>9</sup> [FGM procedural information](#)

The duty applies to all persons in our school who is employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her, or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

Our school staff are trained to be aware of the risk indicators of FGM identified in this section. Concerns about FGM outside of the mandatory reporting duty should be reported as per our school's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children/learners about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate. There are no circumstances in which a member of staff should examine a girl.

**Circumstances and occurrences that may point to FGM happening are:**

- child talking about getting ready for a special ceremony
- family taking a long trip abroad
- child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia, and Pakistan)
- knowledge that the child's sibling has undergone FGM
- child talks about going abroad to be 'cut' or to prepare for marriage

**Signs that may indicate a child has undergone FGM:**

- prolonged absence from school and other activities
- behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still and looking uncomfortable
- complaining about pain between the legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinal tract infection
- disclosure

**The 'One Chance' Rule (see Appendix 10)**

As with Forced Marriage (outlined in Appendix 8) there is the 'One Chance' rule. It is essential that settings/schools/colleges act **without delay** and make a referral to children's services.

## **Appendix 8**

### **Forced Marriage**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is different from an arranged marriage which is common in several cultures. In an arranged marriage, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the Local Authority Safeguarding team.

## **Appendix 9**

### **Honour Based Abuse**

Honour based abuse (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

## **Appendix 10**

### **One Chance Rule**

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a child/learner who is a potential victim and have just one chance to save a life.

Our schools are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

## Appendix 11

### Mental Health

Staff will 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. Whilst schools recognise that only appropriately trained professionals can diagnose mental health problems; staff are able to make day to day observations of children and identify such behaviour that may suggest they are experiencing a mental health problem or be at risk of developing one.

How traumatic Adverse Childhood Experiences and experiences of abuse and neglect can impact on a child's mental health, behaviour, and education through to adolescence and adulthood will be covered in safeguarding awareness training and updates. If staff have a concern about a child's mental health that is also a safeguarding concern, they will share this with the DSL or deputy. Our schools will also refer to the mental health and behaviour in schools' guidance<sup>10</sup>.

When supporting children experiencing mental health difficulties, the Mental Health Lead will explore resources such as:

[The Link Programme](#) Anna Freud National Centre for Children and Families

[Senior Mental Health Lead Training](#)

[Promoting children and young people's mental health and wellbeing](#)

[Rise Above: Resources for School from Public Health England #esafety](#)

[Every Interaction Matters Webinar](#)

[Wellbeing for Education Recovery](#)

[Preventing and Tackling Bullying](#)

[Promoting and supporting mental health and wellbeing in schools and colleges](#)

---

<sup>10</sup> [Mental health and behaviour in schools: guidance](#)

## Appendix 12

### Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. A relative in this situation is either a grandparent, brother, sister, uncle, or aunt. They can be a full or half relation and could be related by marriage. Relatives also include stepparents.

Partners of the mother or father of a child would not qualify as a relative; neither would extended family members such as great aunts, great uncles, or parent's cousins.

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

There are many reasons why a child may be in a private fostering situation. They include:

- living with a family friend because of a family crisis
- a teenager (possibly a teenage parent) is living with friends or neighbours.
- their parents may be studying or working unsociable hours.
- refugee and homeless children
- children with parents overseas
- trafficked children

Private fostering occurs in all cultures, and children may be privately fostered at any age. Our schools recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the Local Authority Safeguarding team of the circumstances.

For more information about what you should do if you come across a private fostering situation, download the [Private fostering: professionals guide](#). Private fostering awareness (City of London) app

This app has been created as a resource and training tool to help multi-agency professionals and communities develop an understanding of what private fostering is, why it may happen and their role in identifying and engaging with families caring for a child in a potential private fostering arrangement. This includes training on issues such as those faced by children from overseas who are living in the UK with somebody other than their parents or legal guardian.

Users are also provided with a digital certificate upon successful completion of a competence test, which assesses your understanding and helps address knowledge gaps.



Overall, use of the app aims to create greater levels of confidence in competence for key practitioners to equip them with the confidence to identify and reflect on children in such situations to ensure a mutually beneficial outcome for all involved.

Download from the [App Store](#) or [Google Play](#).

## **Appendix 13**

### **Looked After Children and Previously Looked After Children**

The most common reason for children becoming looked after is because of abuse and neglect. Our schools will ensure that staff have the necessary skills and understanding to keep looked after/previously looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual school head for children in care.

The designated teacher for looked after children works with the virtual school head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan. The designated teacher will follow the statutory guidance 'Promoting the Education of Looked After Children.'

## **Appendix 14**

### **Children Missing Education**

Attendance, absence, and exclusions are closely monitored. The school will hold more than one emergency contact number for children/learners where possible. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'<sup>11</sup>.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

---

<sup>11</sup> [CME Statutory Guidance for Local Authorities](#)

## Appendix 15

### Child on Child Abuse (including Sexual Violence, Sexual Harassment and HSB)

The DSL, Board of Directors and principal will take due regard to Part 5, KCSiE.

In most instances, the conduct of children/learners towards each other will be covered by our Behaviour Policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Our schools recognise that children can abuse their peers. It will not be passed off as 'banter' or 'part of growing up.' Some examples of child-on-child abuse are outlined below.

- domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- child sexual exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- harmful sexual behaviour – children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- up skirting – which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- serious youth violence<sup>12</sup> – any offence of most serious violence or weapon enabled crime, where the victim is aged 0-19' i.e., murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences. All staff will receive training so that they are aware of indicators which may signal that children are at risk from or involved with serious violence and crime.
- 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); and
- consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery).

The term child-on-child abuse can refer to all these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with child-on-child abuse (i.e., girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence).

Our schools aim to reduce the likelihood of child-on-child abuse through:

- the established ethos of respect, friendship, courtesy, and kindness.
- high expectations of behaviour.
- clear consequences for unacceptable behaviour.

---

<sup>12</sup> [Preventing youth violence and gang involvement](#)

- providing a developmentally appropriate PSHE curriculum which develops children/learners' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe.
- systems for any child/learner to raise concerns with staff, knowing that they will be listened to, valued, and believed.
- robust risk assessments and providing targeted work for children/learners identified as being a potential risk to other children/learners and those identified as being at risk.

Research indicates that young people rarely disclose child-on-child abuse and that if they do, it is likely to be to their friends. Therefore, our schools will also educate children/learners in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

Any concerns, disclosures, or allegations of child-on-child abuse in any form should be referred to the DSL using the school's child protection procedures as set out in this policy. Where a concern regarding child-on-child abuse has been disclosed to the DSL(s), advice and guidance will be sought from the Local Authority Safeguarding team and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

Working with external agencies the school will respond to the unacceptable behaviour. If a child/learner's behaviour negatively impacts on the safety and welfare of other children/learners, then safeguards will be put in place to promote the well-being of the children/learners affected and the victim and perpetrator will be provided with support.

### **Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate, or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers, or children. Staff should be vigilant to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals
- up skirting

## **Developmental Sexual Activity**

Encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional, and behavioural relationships with each other. Such sexual activity is information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

## **Inappropriate Sexual Behaviour**

Can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. To more determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

**Equality** – consider differentials of physical, cognitive, and emotional development, power and control and authority, passive and assertive tendencies.

**Consent** – agreement including all the following:

- understanding what is proposed based on age, maturity, development level, functioning and experience.
- knowledge of society's standards for what is being proposed.
- awareness of potential consequences and alternatives
- assumption that agreements or disagreements will be respected equally.
- voluntary decision
- mental competence

**Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality, or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice are available from your local authority.

## Appendix 16

### Online Safety

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of learners, staff, volunteers, and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### The 4 key Categories of Risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as 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** – personal online behaviour that increases the likelihood of, or causes, harm, such as 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

### To meet our aims and address the risks above, we will:

- Educate learners about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring learners are encouraged to do so, including where they're a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when learners are not present.
  - Staff will not take pictures or recordings of learners on their personal phones or cameras.
- Make all learners, parents/carers, staff, volunteers, and SAP aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, learners and parents/carers are aware that staff have the power to search learners' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems. **The school will be using net sweeper to ensure they are meeting the governments required standard on monitoring and filtering.**
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies.

Melrose Education strives to support children/learners, and its staff in the appropriate use of this technology whilst taking the safety of its children/learners and staff seriously. To support this, each school has a named E-Safety Lead who takes overall responsibility for all matters relating to online safety, and the implementation of our online safety procedures.

The named E-Safety Lead is also responsible for carrying out the Melrose Education E-Safety Audit, and embedding an E-Safety agenda point at staff meetings on a termly basis to ensure our robust procedures are evaluated and communicated on a regular basis. Full details of the role of the E-Safety Lead can be found in our E-Safety – Acceptable Use of Technology Policy.

Our online safety procedures are outlined in the following policies:

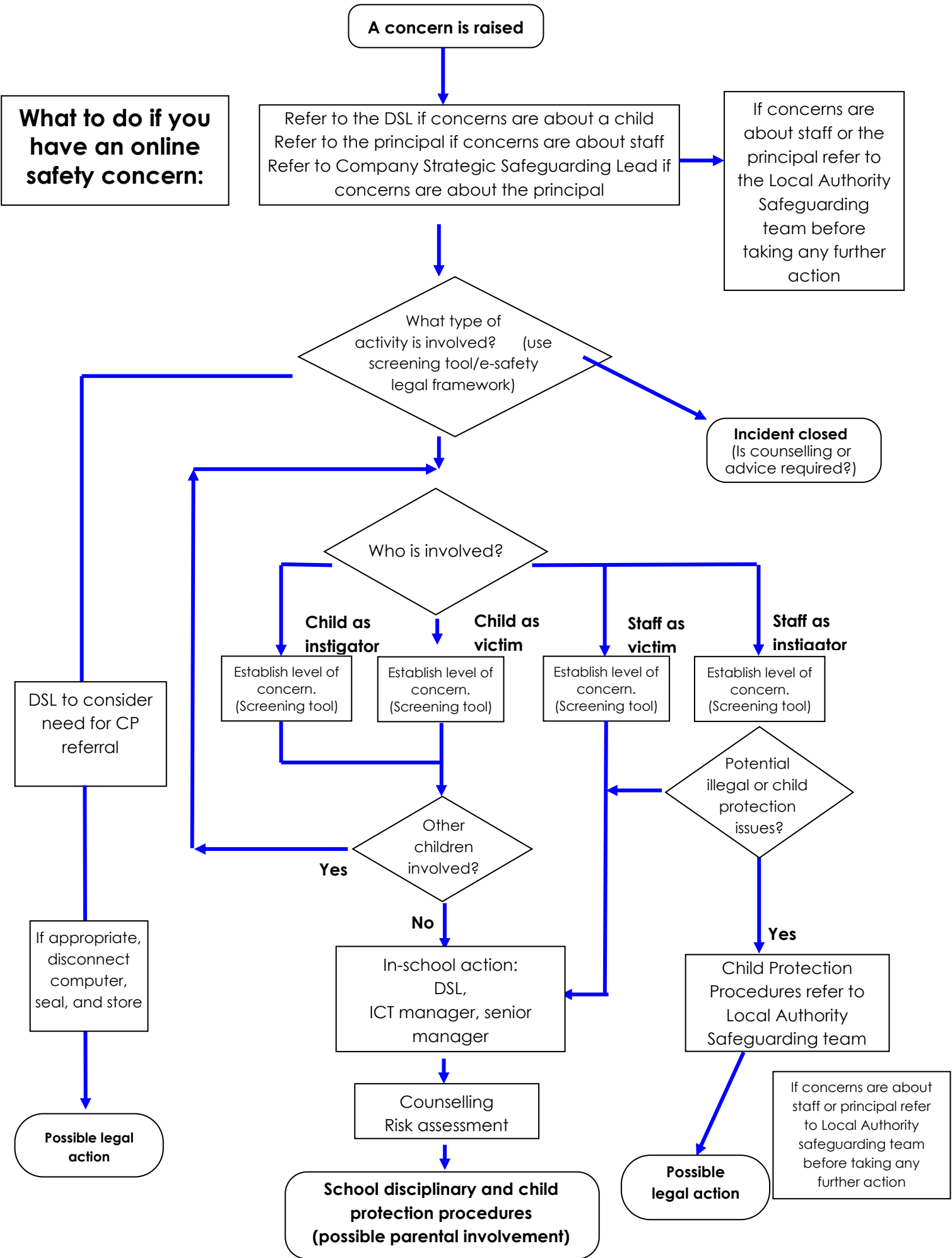
E-Safety – Use of Computers, Internet and Email, and E-Safety – Acceptable Use of Technology. We also operate a social media Policy and share with staff a Social Networking Guide – Protecting Your Digital Footprint. Staff are asked to sign our Acceptable Use of Technology Declaration and should follow the flowchart below when responding to online safety incidents.



We will also provide extra advice to parents/carers when children/learners are being have to learn online at home due to exceptional circumstances and consider how best to safeguard both children/learners and staff.

Children/learners are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

Staff will follow the flowchart on the following page if they have an online safety concern.



## Appendix 17

### **Learners sharing nudes/semi-nude images and videos (Sexting)**

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

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

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

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'<sup>13</sup>, and 'Sharing nudes and semi-nudes: how to respond to an incident.'<sup>14</sup>

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

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

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

Immediate referral at the initial review stage should be made to the Local Authority Safeguarding team/police if.

- the incident involves an adult.
- there is good reason to believe that a young person has been coerced, blackmailed, or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).
- what you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- the imagery involves sexual acts.

---

<sup>13</sup> [Sexting in schools and colleges](#)

<sup>14</sup> [Sharing nudes and semi-nudes: how to respond to an incident \(UCKIS\)](#)

- the imagery involves anyone aged 12 or under.
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to children/learners involved and may decide, with input from the principal, to respond to the incident without escalation to the Local Authority Safeguarding team or the police. Such decisions will be recorded.

In applying judgement, the DSL will consider if:

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

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

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

## Appendix 18

### Additional Resources

Further advice on child protection is available from:

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/home.aspx>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

Childnet International - making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Transgender <http://www.mermaidsuk.org.uk/>

[Schools' transgender toolkit](#)

[Intercom trust transgender guidance](#)

[Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)