



SAFEGUARDING AND CHILD PROTECTION POLICY

September 2023

Responsible member of SLT and Designated Senior Leader: **Scott Sanderson**

Responsible members of the Governing Body: **Heather Trim, Sheila Mansell and Nick Caddick**

The policy applies to **All Staff**

Next review: **August 2024**

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Safeguarding Policy Statement

Alton School (“the School”) is committed to a whole school approach to safeguarding and promoting the welfare of children. All pupils have the right to be protected from all types of harm and abuse, and all school systems, processes and policies should operate with the best interests of the child at their heart. This *Safeguarding and Child Protection Policy* (“this Policy”) forms a fundamental part of our approach to providing excellent pastoral care for *all* pupils, including young people who may be over the age of 18 years.

Raising a Concern

Are you worried a child may be at risk of harm?



Speak directly to the school’s DSL, DDSL or a member of the Safeguarding Team (see p.4 below)



If you are still concerned, or you are unable to contact one of the school’s Safeguarding Team, please contact:
Children’s Services at Hampshire County Council on 0300 555 1384
or the out-of-hours service on 0300 555 1373
The Children’s Commissioner on 020 7783 8330
NSPCC on 0808 800 5000 (help@nspcc.org.uk)

If staff feel their that concerns are not being taken seriously by the school or that safeguarding practice at the school is inadequate or is not working properly, they should call the NSPCC Whistleblowing Helpline on 0800 028 0285

SAFEGUARDING TEAM AND KEY PERSONNEL

The Designated Safeguarding Lead (DSL) is:

Scott Sanderson – Deputy Head: Student Development

- Contact details: email: ssanderson@altonschool.co.uk Telephone: 01420-82070

The Deputy Designated Safeguarding Leads are (DDSLs)

Sarah Harvey – Director of Nursery (EYFS)

- Contact details: email: sharvey@altonschool.co.uk Telephone: 01420-82070

Geraldine Mooney – Director of Lower School

- Contact details: email: gmooney@altonschool.co.uk Telephone: 01420-82070

Jackie Ward – Director of Upper School

- Contact details: email: jward@altonschool.co.uk Telephone: 01420-82070

Safeguarding Support Team:

Cathy Short: email: cshort@altonschool.co.uk Nursery

Gillian Eacott: geacott@altonschool.co.uk Middle School

The Nominated Safeguarding and Child Protection Governors are:

Mrs Heather Trim, Mrs Sheila Mansell and Mr Nicholas Caddick

- Contact through the Clerk to the Governors: email: mjackson@altonschool.co.uk
Telephone: 01420-82070

The Chair of Governors is:

Mr Clive Hexton

- Contact through the Clerk to the Governors: email: mjackson@altonschool.co.uk Telephone:
01420-82070

The Headmaster is:

Mr Andrew Reeve

- Contact details: email: headmaster@altonschool.co.uk Telephone: 01420-82070

KEY CONTACTS WITHIN THE LOCAL AUTHORITY

HAMPSHIRE CHILDREN'S SERVICES

REFERRAL INTO CHILDREN'S SOCIAL CARE

Where schools have **URGENT** and **IMMEDIATE** concerns for the safety and welfare of a child or young person during office hours telephone:

Child Protection Services 0300 555 1384 (parent/general line)

Professionals Line

01329 225379

To make URGENT referrals OUT OF OFFICE HOURS after 5pm or at weekends

0300 555 1373

Safeguarding advisors / Local Authority Designated Officers (LADOs)

(Concerns with staff)

The two Hampshire County Council LADOs are Barbara Piddington & Mark Blackwell, based in the Safeguarding Unit.

The LADOs cover separate districts of the county, but each will cover for the other during periods of leave or absence.

Fiona Armfield may provide cover in times of absence in her role as LADO for specialist and residential provision.

Barbara Piddington covers: East Hampshire, Fareham, Gosport, Havant, Hart and Rushmoor.

Mark Blackwell covers: Basingstoke, Eastleigh, New Forest, Test Valley and Winchester.

The LADOs can be contacted on telephone number: 01962 876364

SURREY CHILDREN'S SERVICES

Phone: 0300 470 9100

Out of hours phone: 01483 517898 to speak to our emergency duty team.

Email: emails are dealt with during normal office hours

For concerns for a child or young person: cspa@surreycc.gov.uk

For concerns for an adult: ascmash@surreycc.gov.uk

SMS: 07527 182 861 (for the deaf or hard of hearing)

VRS: Sign Language Video Relay Service

Fax number: 01483 519862

The LADO can be contacted on 0300 123 1650* or LADO@surreycc.gov.uk.

WEST SUSSEX CHILDREN'S SERVICES

Phone: 01403 229900 (Monday – Friday between 9.00am and 5.00pm)

Out of hours phone: 0330 222 6664 to speak to Emergency Duty Team.

If the Emergency Duty Team line is unavailable and you need to report an emergency safeguarding concern, please call 07711 769657. This number does not accept texts.

LADO Contact: Lindsey Tunbridge-Adams [Tel: 0330 222 3339](tel:03302223339) adams@westsussex.gov.uk

Assistant LADO Contact: Claire Coles Tel: 0330 222 3339 Claire.Coles@westsussex.gov.uk

BERKSHIRE CHILDREN'S SERVICES

West Berkshire Council - Contact Advice and Assessment Service (CAAS) - 01635 503190

West Berkshire LADO – 01635 503090

Bracknell Forest - MASH - 01344 352005

Bracknell Forest LADO: lado@bracknell-forest.gov.uk Tel: 01344 351572

Secure E-mail: cspoa@brighterfuturesforchildren.org

PARENTS

The first contact for this school is 'Hampshire, Surrey, Berkshire and West Sussex'

In the case of emergencies contact the Police on 999 or 101

There are additional numbers for other agencies in the appendices

Terminology

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- 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 school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child includes everyone under the age of 18.

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

1. INTRODUCTION

1.1 Safeguarding and Child Protection Policy

1.1.1 This Policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of pupils at the School. They have been prepared in compliance with, and with regard to:

- The Education Acts
- *Education (Independent Schools Standards) Regulations 2014* (as amended from time to time)
- *The Independent School Standards Guidance for independent schools* April 2019
- *Safeguarding and protecting people for charities and trustees* (Charity Commission, June 2022)
- Safeguarding Vulnerable Groups Act 2006
- The Protection of Freedoms Act 2012
- The Children Act 2004
- *What to do if you're worried a Child is being Abused* March 2015
- *Working Together to Safeguard Children* July 2018 (A guide to inter-agency working to safeguard and promote the welfare of children)
- *Keeping Children Safe in Education* September 2023
- *Disqualification under the Childcare Act 2006* September 2018
- *Information Sharing: advice for practitioners providing safeguarding services* July 2018
- DBS Referrals Guidance (as may be amended from time to time)
- *National Minimum Standards for Boarding Schools* September 2022
- *Teacher misconduct: regulating the teaching profession* March 2014 (and related guidance)
- *Use of Reasonable Force in Schools* July 2013
- *Preventing and Tackling Bullying* July 2017
- *Mental Health and Behaviour in Schools* November 2018
- *Statutory Framework for the Early Years Foundation Stage (EYFS)* September 2021
- *Prevent Duty Guidance* April 2021, *Channel Guidance* 2020, and *Prevent guidance for those with safeguarding responsibilities* October 2022
- *The use of social media for online radicalisation* July 2015
- *Teaching Online Safety in School* June 2019
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people* UKCIS December 2020
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education* 2019
- *When to call the police: guidance for schools & colleges* NPCC
- *Meeting digital and technology standards in schools and colleges* March 2022

1.1.2 The School recognises and acts upon the legal duties set out in the above statutes, regulations and guidance, to protect its pupils (and staff) from harm, and to co-operate with other agencies in carrying out those duties and responding to safeguarding concerns.

1.1.3 This Policy is used in accordance with locally agreed inter-agency procedures, and specifically in accordance with Hampshire County Council local safeguarding partner guidance, including the local criteria for action and protocol for assessments (see Key Contacts on Page 5). The School will ensure that its safeguarding arrangements take into account local procedures and practice, including local criteria for action and protocol for assessment.

- 1.1.4 This Policy is addressed to all members of staff and volunteers at the School (temporary and permanent). Adherence to this Policy is mandatory for **all** staff and volunteers and its use is not subject to discretion. This Policy applies whenever staff or volunteers are working with pupils, including where this is away from the School, for example at another institution, on school visits and trips, as well as sporting and cultural activities.
- 1.1.5 This Policy is available to all parents, staff and volunteers on the School's website. A paper copy of this Policy is also available to parents upon request to the School office.
- 1.1.6 Pupils are taught about how to keep themselves and others safe both on and offline, including how to adjust their behaviour to reduce risks, keep themselves safe and build resilience; and are made aware of this Policy through the Personal, social, health and economic (PSHE) programme and other means of sharing information appropriate to their context, age and understanding, within a broad and balanced curriculum.

1.2 Creating a Culture of Safeguarding

- 1.2.1 The School recognises that safeguarding covers much more than child protection, and so this Policy will operate in conjunction with the Staff Code of Conduct and other related policies and procedures. These cover areas including equal opportunities; Health and Safety; First Aid; educational visits; anti-bullying; behaviour management; drugs, alcohol and tobacco; information sharing; online safety (including mobile technology, social media and filtering and monitoring); Fundamental British Values, and Preventing radicalisation and violent extremism. Such policies are available from the School on request.

The School takes seriously its responsibility to promote and nurture the mental health and wellbeing of all its pupils and staff. This is reflected in its policies and procedures for pastoral care and the School's PSHMEE programme.

- 1.2.2 'Safeguarding' is broader than 'child protection'. As well as protecting children from harm, 'safeguarding' widens the responsibility to preventing harm and promoting the welfare of children. It is recognised that safeguarding and promoting the welfare of children includes:
- Protecting children from maltreatment
 - Preventing the impairment of children's mental and physical health or development
 - Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes.

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. The School recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly, and challenging inaction.

- 1.2.3 Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. Everyone who works with our pupils should make sure that their approach is child-centred (that is, that they consider at all times what is in the best interests of the child).
- 1.2.4 As well as ensuring that the School's policies and procedures support its safeguarding responsibilities, the School will work with pupils and their families, and contribute to inter-agency working, in line with the statutory guidance *Working Together to Safeguard Children*. This includes providing a co-ordinated offer of

early help when additional needs of children are identified, and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

We are committed to working in partnership with parents, Social Services Departments and diverse communities, to continuously develop and improve the safeguarding culture within our School.

1.2.5 Having these safeguards in place not only protects and promotes the welfare of children but also it enhances the confidence of our staff, volunteers, parents/carers and the general public.

1.2.6 The School has systems to:

- Prevent unsuitable people working with pupils;
- Identify pupils who are at risk of and/or are likely to suffer significant harm and take appropriate action, and promote the welfare of pupils in need of additional support;
- Promote safe practice and challenge poor and unsafe practice;
- Protect students and staff from online risks; these include online safety education and training, policies and procedures governing the use of IT, and procedures to manage any incidents that occur;
- Provide filtering and monitoring in line with the guidance issues by the Department for Education in their filtering and monitoring standards;
- Deal with issues of confidentiality, information sharing and consent;
- Ensure that staff do not, through their actions, place **pupils** at risk of harm, or place themselves at risk from an allegation of harm (by providing guidance on areas such as 1:1 tuition, sports coaching, conveying by car, inappropriate electronic communication). Relevant guidance can be found in the Staff Code of Conduct Policy.

1.2.7 The School encourages the pupils in its care to raise any concerns that they might have and ensure that these are taken seriously. The School also encourages pupils to contribute their own ideas, appropriate to their age and understanding, about how their safety and welfare could be further improved.

1.2.8 All staff are required to adhere to the *ICT Acceptable Use Agreement*, and specifically to ensure that any images taken of pupils are appropriate and stored and managed safely.

1.3 Implementation Procedures

The School has implementation procedures to assist staff and volunteers when handling safeguarding concerns.

Information on these procedures is available to all staff and volunteers at the School and the procedures must be followed at all times.

1.4 Early Years Foundation Setting

1.4.1 This Policy applies to the School's provision for the Early Years Foundation Setting ('EYFS'). The identity of and contact details for the Designated Safeguarding Lead/s with responsibility for safeguarding within this setting are set out on Page 4, Key personnel.

1.4.2 Throughout the setting all persons in the EYFS are required to adhere to the Using Mobile Phones and Devices including EYFS Policy and the *ICT Acceptable Use Agreement* on the use of mobile phones and cameras: that is, that images of pupils may not be stored on personal devices. Any images taken on personal devices will be transferred to a school system as soon as reasonably possible and the personal copy permanently removed.

1.4.3 Safeguarding training for staff in the EYFS will include guidance on identifying signs of possible abuse and neglect (such as significant changes in a pupil's behaviour, deterioration in wellbeing, physical indications, comments which give cause for concern, or any reasons to suspect neglect or abuse outside the setting), and on how to respond in a timely and appropriate way to such signs or to inappropriate behaviour in other members of staff or any other person working with children (EYFS Statutory Framework 3.6).

1.5 Children potentially at greater risk of harm

1.5.1 Children with Special Educational Needs and Disabilities or Physical Health Issues

Children with special educational needs and disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, including particular vulnerability to child-on-child abuse. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- Being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- The potential for children with SEND or certain medical conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in managing or reporting these challenges;
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

To address these additional challenges, such children may require extra pastoral support and attention, alongside any appropriate support for communication. Their additional vulnerabilities should also be particularly carefully considered in situations where the use of reasonable force may be needed. Any reports of abuse involving children with SEND will require close liaison with the DSL and SENCO.

1.5.2 Children who are lesbian, gay, bi or trans (LGBT)

Being LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT or perceived to be LGBT can be targeted by other children and risks can be compounded where such children lack a trusted adult. Staff should therefore endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns.

1.6 For information on children who need a social worker, children absent from education, elective home education, looked after children and care leavers see the *Related Safeguarding Procedures*.

1.7 Private Fostering

Private fostering occurs where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home. If a member of staff becomes aware that a pupil may be in a private fostering arrangement, they should raise this in the first instance with the Designated Safeguarding Lead. The School will then notify the local authority of the circumstances.

2. Policy Aims

2.1 Our aims are to:

- 2.1.1 Create an environment in the School which is safe and secure for all pupils.
- 2.1.2 Encourage our pupils to establish satisfying relationships within their families, with peers and with other adults.
- 2.1.3 Encourage children to develop a sense of autonomy and independence.
- 2.1.4 Work with parents to build their understanding of and commitment to the welfare of all pupils.

2.2 In order to fulfil these aims the Head will take the necessary steps to ensure that:

2.2.1 All staff (including supply and temporary staff), governors and volunteers receive training in safeguarding children and an explanation of the systems within the School which support this as part of their induction. This includes:

- Alton Schools Safeguarding and Child Protection Policy (which includes whistleblowing procedures) and the staff *Code of Conduct*
- Part 1/Annex A of *Keeping Children Safe in Education* (and Annex B for those who work directly with children)
- The School's behaviour policy
- The safeguarding response to children who are absent from education
- The identity and role of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s)
- Online safety

2.2.2 All staff, governors, volunteers and the Head are trained in child protection (including Prevent awareness, online safety training, the local early help process, the referrals process and how to manage a report of child-on-child sexual violence or sexual harassment) regularly (in line with local safeguarding partner requirements), and receive safeguarding and child protection updates as required, but at least annually. Safeguarding training must be integrated, aligned and considered as part of the whole school safeguarding approach and staff training programme. The Designated Safeguarding Lead must receive the required updated child protection and Prevent training at least every two years (as set out in Annex C of *Keeping Children Safe in Education*)

2.2.3 The School adheres to Alton Schools Recruitment Policy and guidance and safer recruitment procedures. Procedures are in accordance with the *Independent School Standards Regulations* and include ensuring that at least one member of any recruitment panel involved in all stages of the recruitment process has undertaken the appropriate training in Safer Recruitment, and carrying out all required checks on the suitability of all staff and volunteers to work with children and young people in accordance with the guidance and regulations set out at paragraph 1.1.2. Appropriate supervision arrangements are put in place if staff start work before their DBS disclosure has been obtained, and in all cases a Barred List Check and Prohibition Order check (if applicable) will have been undertaken. Relevant staff are also asked to confirm that they do not meet the criteria for disqualification under the Childcare Act 2006 and the 2018 Regulations.

2.2.4 The School obtains assurance that appropriate child protection checks are carried out and procedures apply to any staff or volunteer of another organisation who work with the School's pupils on another site (for example, in a separate institution).

2.2.5 Appropriate checks are carried out on external visitors coming onto the school site, depending on their business with the School and level of contact with children. Where relevant, this will include an assessment of the suitability, educational value and age appropriateness of any activities or material to be delivered. Further details can be found in the School's Visiting Speakers Protocol.

2.2.6 The School carries out the mandated checks on the suitability of all people who serve on our School Governing Board in accordance with the guidance and regulations set out at paragraphs 1.1.2 and in accordance with Alton School policy. The required checks on Trustees (as the proprietors) are carried out centrally by Alton School.

2.2.7 The School will refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child where:

- the harm test is satisfied in respect of that individual;
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed if they had not left (this includes suspension or deployment to another area of work that is not regulated activity)

The referral will be made as soon as possible after the resignation, removal or redeployment of the individual in accordance with the procedural guidance at <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>. In cases involving teaching staff, the School will also consider whether it would be appropriate to refer the matter to the Teaching Regulation Agency (TRA) who may decide to prohibit the individual from teaching.

2.2.8 All School staff are alert to signs of abuse and neglect, and all staff know to whom they should report concerns or suspicions of abuse or neglect.

2.2.9 All School staff keep themselves updated on safeguarding issues and child protection procedures by accessing advice, guidance and training as appropriate to their role.

2.3 This Policy is compatible with and meets all applicable requirements of Hampshire County Council local safeguarding partners. The School ensures that it has positive communication with the local safeguarding partners to ensure compliance with local protocol and access to relevant support. The local safeguarding partners can be contacted through the Local Social Services Department (Children’s Services) “Social Services”. Their contact details can be found on pages 5 and 6.

3. Responding to Safeguarding and Child Protection Concerns

3.1 Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. School staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

3.2 Any concern, allegation or incident of abuse must be referred to the Designated Safeguarding Lead immediately. Staff should not assume that a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about sharing information or recording requirements, staff should discuss this with the Designated Safeguarding Lead. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

3.3 If staff have concerns about a child (as opposed to a child being in immediate danger or at risk of harm – see para 3.5 below) they will need to decide what action to take. All staff should be prepared to identify children who may benefit from **early help**, that is, support as soon as a problem emerges. Such problems should be

discussed in the first instance with the Designated Safeguarding Lead. The early help process may also involve sharing information with other professionals and contributing to an early help assessment.

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

- Is disabled, has certain health conditions and has specific additional needs
- Has special educational needs
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing alcohol and other drugs themselves
- Has returned home to their family from care
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child, and
- Is persistently absent from education, including persistent absences for part of the school day

3.5 If a child is in **immediate danger or at risk of harm**, this must be reported to the Designated Safeguarding Lead, who will make a referral to local authority children's social care and/or the police immediately (see section 5.12). It is not the role of the School to investigate suspected or alleged abuse; this is the role of the Police and Social Services.

3.6 What is Child Abuse?

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children. Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

The categories listed below are drawn from *Keeping Children Safe in Education*:

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

3.6.2 Emotional abuse – the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or

developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

3.6.3 Sexual abuse - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at or the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

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

3.6.5 Child sexual exploitation (CSE), child criminal exploitation (CCE) and forms of so-called 'honour based' abuse, including female genital mutilation (FGM) are child abuse, and domestic abuse and attempts to draw children into violent extremism or serious violent crime should also be treated as safeguarding issues. Further information on these areas can be found in the *Safeguarding Procedures*. If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18 the teacher must report this to the police.

3.6.6 Sharing nude and semi-nude images is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences are serious and put those involved at risk of serious harm. Having or sending explicit material on digital devices is also a criminal offence for those under 18. Pupils are taught about this as part of their internet safety education. The School takes incidences of sharing nude and semi-nude images extremely seriously, and deals with them in accordance with child protection procedures, including reporting to the police.

3.6.7 Who are the abusers? Abusers might be parents or carers, siblings or members of the extended family, neighbours, teachers, strangers; in short, an abuser could be anyone.

3.6.8 Child-on-child abuse: all staff should also recognise that children are capable of abusing other children, and that this can happen and must be addressed whether it occurs inside school, outside school or online. Even if there are no reports, it does not mean it is not happening, it may be the case that it is just not being reported. For this reason, it is important that staff are alert to the signs of child-on-child abuse and that pupils feel able to report incidents, knowing they will be treated seriously. Child-on-child abuse is most likely to include, but is not limited to:

- bullying (including cyber, prejudice-based and discriminatory bullying)

- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery),
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse, or humiliation used as a way of initiating a person into a group and may also include an online element)

It is more likely that girls will be victims of child-on-child abuse and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously. Child-on-child abuse should be recognised as abuse and challenged as such. A zero-tolerance approach will be taken whereby it is never passed off as ‘banter’, ‘just having a laugh’, ‘part of growing up’ or ‘boys being boys’. This can lead to a culture of unacceptable behaviours, an unsafe environment for children and, at worst, children accepting this as normal and not coming forward to report it. The School seeks to minimise the risk of such abuse by ensuring that it is clear to all members of the school community that it is not tolerated, and by educating pupils as part of the PSHE programme about healthy and respectful relationships, the wider societal factors (such as sexist stereotypes and language), and how to recognise, report and respond to child-on-child abuse.

Any concern about child-on-child abuse must be reported to the DSL. Allegations will be promptly and thoroughly investigated, recorded and treated according to their gravity, in line with the School’s anti-bullying or behaviour policy. The threshold for dealing with an issue of pupil behaviour or bullying under the safeguarding procedure is, subject to local specifics as in any other cases, when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. In such cases the School’s response will include referral to local authority children’s social care or the police. Victims, perpetrators and any other child affected will be supported within the pastoral care structure, taking account of their views and feelings, and support may include counselling where appropriate. All children involved will be treated as ‘at risk’.

3.6.9 Contextual safeguarding: safeguarding incidents and/or behaviours can be associated with factors outside school and can occur between children outside school. All staff should consider the context within which such incidents and/or behaviours occur. It is important to provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

3.7 Signs of abuse

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

The following may help staff to be aware of possible signs of abuse – There are further sources of information such as *What to do if you're worried a child is being abused* and the NSPCC website. However, such lists are not exhaustive - if staff members are unsure, they should always seek advice and report concerns even where signs/indicators are not present. Staff should also be alert to behaviours or circumstances that put children in danger, such as drug taking, alcohol abuse, self-harm, truanting, cyber bullying and sexting.

(There may be other signs of abuse specific to female genital mutilation, and to radicalisation of young people. These are described in the *Appendices*.)

3.7.1 Physical Abuse

- Unexplained injuries/burns
- Untreated injuries
- Bruises/abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear

3.7.2 Emotional Abuse

- Excessive overreaction to mistakes
- Continual self-deprecation
- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol and substance misuse
- Significant peer relationship difficulties

3.7.3 Sexual Abuse

- Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- Self-harm
- Pregnancy
- Sexually transmitted diseases
- Sudden changes in behaviour or school performance
- Fear of undressing for gym
- Depression/withdrawal
- Drug, alcohol, substance abuse

3.7.4 Neglect

- Constant hunger, tiredness and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies
- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

3.7.5 Child absent from education

A child missing or persistently absent from an education setting is a potential indicator of abuse and neglect. Staff should treat prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly.

3.7.6 Mental Health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering, abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are however well placed to observe children and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. It is also important that staff are aware how adverse childhood experiences can have a lasting impact on children's mental health, behaviour and education. If staff have a concern about a child which is also a safeguarding concern, immediate action should be taken following the procedures in this Policy (see Appendix 2 on Page 25 for more information).

4. Designated Safeguarding Lead (DSL)

- 4.1 The School has appointed a Designated Safeguarding Lead and deputies to contact in his absence. The Designated Safeguarding Lead is Mr Scott Sanderson who is a member of the School's Senior Leadership Team and has the necessary status and authority to take lead responsibility for child protection matters (including online safety). This responsibility cannot be delegated. The School will ensure that the Designated Safeguarding Lead is given the time/cover, funding, training, resources and support to fulfil their role.

During term time, the Designated Safeguarding Lead and/or a deputy will always be available (during school hours) for staff to discuss any safeguarding concerns. Adequate and appropriate cover will be arranged for any out-of-hours/out-of-term activities. The Designated Safeguarding Lead will ensure that arrangements for cover are communicated clearly to staff.

The Designated Safeguarding Lead will:

- 4.1.1 be responsible for ensuring that all cases of suspected or actual child protection concerns are dealt with in accordance with the guidance and regulations set out in paragraph 1.1.2;
- 4.1.2 refer cases of suspected abuse or allegations to the local Social Services Department and/or the police in accordance with local safeguarding partner procedures, and work with other agencies in line with *Working Together to Safeguard Children*;
- 4.1.3 receive *Prevent* awareness training; provide advice and support, and make appropriate referrals through the *Channel* programme;
- 4.1.4 take lead responsibility for online safety (as outlined in the Online Safety Policy)
- 4.1.5 ensure that they are aware of the latest national and local guidance and requirements and will keep the Head, staff and volunteers informed as appropriate;
- 4.1.6 receive appropriate training in child protection matters and interagency working, to include both national and local bodies, at least every two years, and in addition to formal training, update their knowledge and skills at regular intervals and at least annually, in order to keep up with developments relevant to the role. Deputy DSLs will be trained to the same level as DSLs;
- 4.1.7 ensure that the Head, staff and volunteers have access to and understand their role as appropriate in the child protection procedures, including but not limited to: part-time staff, supply staff, peripatetic staff, newly appointed staff, newly qualified staff, before/after school care staff, boarding staff, gap year students, volunteers, catering staff, cleaning staff and caretakers;

4.1.8 act as a source of advice and support within the School and co-ordinate action regarding referrals in relation to both children and allegations against staff.

5. Responding to Disclosures of Abuse

- 5.1 Children are more likely to be abused by someone they know and trust than by a stranger. Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. Staff should also be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may feel embarrassed, humiliated, or threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. When concerned about the welfare of a child, staff members should always take action in the best interests of the child and consider how best to build trusted relationships with children which facilitate communication.
- 5.2 Staff and volunteers should make themselves available to reassure the pupil that what they are saying is being taken seriously and without criticism, and should respond in a supportive, calm manner, avoiding asking detailed questions. The role of the staff member or volunteer is to listen, record and report; not to investigate. A pupil should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. No pupil should ever be made to feel ashamed for making a report. Staff and volunteers should also take care to ensure that their behaviour and actions do not place pupils or themselves at risk of harm.
- 5.3 If a pupil reports abuse from another pupil or pupils, staff should follow the procedures in this section. All children involved, whether a potential perpetrator or victim, will be treated as being 'at risk'. The Designated Safeguarding Lead will liaise with local agencies in relation to handling any such cases which arise. A bullying incident will be regarded as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. See the Anti-Bullying Policy.
- 5.4 Immediate Response
If a disclosure is made, the member of staff or volunteer **should**:
- 5.4.1 allow the pace of the conversation to be dictated by the pupil;
 - 5.4.2 ask open questions which encourage the pupil to talk such as "can you tell me what happened?";
 - 5.4.3 accept what the pupil says and not ask for further detail;
 - 5.4.4 acknowledge how hard it was for them to tell you and show by voice tone and/or facial expression that you are taking their concerns seriously;
 - 5.4.5 note carefully any clearly visible external signs of possible injury or neglect (but note paragraph 5.5.4 below);
 - 5.4.6 reassure the pupil that they have done the right thing, that they are not at fault, and explain whom you will have to tell (the Designated Safeguarding Lead) and why.
- 5.5 The member of staff or volunteer **should not**:
- 5.5.1 burden the pupil with guilt by asking questions such as "why didn't you tell me before?";
 - 5.5.2 interrogate or pressure the pupil to provide information;
 - 5.5.3 ask any potentially leading questions, as this may impact on any potential case brought to court;
 - 5.5.4 undress the child or examine clothed parts of the child's body in an attempt to determine the nature of any such injuries/neglect;

- 5.5.5 criticise the alleged perpetrator, this may be someone they love;
 - 5.5.6 promise confidentiality (see paragraph 5.6 and 5.7);
 - 5.5.7 make promises that they cannot keep such as “I’ll stay with you all the time” or “it will be alright now”;
 - 5.5.8 put words in the child's mouth (i.e. finish their sentences);
 - 5.5.9 jump to conclusions or speculate about what happened or might have happened, or make accusations;
 - 5.5.10 show an overly emotional reaction, such as expressing disgust, shock or disbelief;
 - 5.5.11 attempt to investigate the allegations.
- 5.6 If a pupil confides in a member of staff or volunteer and requests that the information is kept secret, staff/volunteers **must not** make promises about confidentiality. Staff must tell the pupil sensitively that they have a responsibility to tell the named Designated Safeguarding Lead so that the child can be helped to stay safe and feel better.
- 5.7 In every case, the member of staff/volunteer should consider whether the pupil is able to provide consent for the information to be shared and, if so, seek to obtain that consent. If the pupil does not consent, the member of staff/volunteer should explain that they need to share the information with the Designated Safeguarding Lead and reassure them that the information will *only be disclosed* to other people who *need to know*.
- 5.8 The School recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm. The School has age-appropriate systems in place for children to express their views and give feedback so that their wishes or feelings will be taken into account when determining what action to take and what services to provide. However, the child’s wishes or feelings cannot override the duty to refer suspected abuse to local authority children’s social care or police.
- 5.9 The School will provide continuing support to a pupil who has disclosed abuse through promoting a caring and safe environment within the School and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the School will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised.
- 5.10 All allegations involving staff or volunteers will be discussed immediately with the Local Authority Designated Officer (LADO¹) before any investigation takes place. In borderline cases, these discussions can be held without naming the individual.

In any case of immediate risk or serious harm to children, the police shall be informed at the outset.

5.11 Making a record of Information

Staff/volunteers should:

- 5.11.1 make a record of the disclosure or concern, including the date, time, place and context, and what has actually been said (wherever possible using the child's exact words, even if they seem childish, rude or inappropriate), not assumption or interpretation.

¹ Local Authority Designated Officer(s) for Child Protection. Each local authority should have designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children. The term ‘LADO’ in this Policy is used for convenience to designate these local authority designated officer(s) or other appropriate first point of contact for child protection concerns, whatever terminology individual local safeguarding partners may use.

- 5.11.2 clearly distinguish between fact, observation, allegation and opinion.
- 5.11.3 make a record of any observed injuries and bruises.
- 5.11.4 note the non-verbal behaviour and the key words in the language used by the pupil (do not translate into “proper terms”).
- 5.11.5 alert the Designated Safeguarding Lead.
- 5.11.6 appreciate that their records may be used in criminal proceedings or disciplinary investigations.

5.12 Reporting Concerns

5.12.1 Any concerns about pupils must be discussed with the Designated Safeguarding Lead (or in their absence the Deputy Designated Safeguarding Lead) as soon as possible and at latest by the end of the school day.

5.12.2 Where the disclosure identifies a safeguarding issue, the Designated Safeguarding Lead will report the disclosure to the local Social Services Department within 24 hours. In the most serious cases, and if there is suspicion that a crime has been committed, the Designated Safeguarding Lead will contact the police.

5.12.3 The School’s procedures differentiate between safeguarding children who have suffered significant harm and those who are in need of support from one or more agencies. In cases where a child is not suffering or at risk of suffering serious harm, but rather is in need of additional support, an inter-agency assessment will be undertaken to determine the most appropriate action.

5.12.4 Whilst the Designated Safeguarding Lead will usually decide whether to make a referral, **in exceptional circumstances, such as in an emergency or a genuine concern that appropriate action has not been taken, anyone can refer their concerns to local authority children’s social care directly** (see section 9 below). If a member of staff makes a referral independently, they must inform the Designated Safeguarding Lead as soon as possible thereafter.

5.12.5 **If, at any point, there is a risk of immediate serious harm to a child a referral should be made immediately. If the child’s situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.**

5.12.6 For pupils over the age of 18, safeguarding concerns are considered in the context of concerns for their welfare as well as the welfare of others who may be affected and who may be children. It may be necessary to refer such concerns to the local safeguarding adult services in place of, or in addition to children’s social care.

6. Allegations against staff

- 6.1 Schools must follow the procedures for handling allegations made against staff, supply staff, contractors and/or volunteers set out in Part 4 of *Keeping Children Safe in Education*. The aim is to deal with any allegation quickly and in a fair and consistent way which provides effective protection for the child and at the same time provides appropriate support for the person who is the subject of the allegation.
- 6.2 Where a safeguarding-related allegation or cause for concern is made against any member of staff, supply staff, contractor or volunteer (including the Designated Safeguarding Lead), the matter should be reported immediately to the Head (unless the allegation relates to the Head or there is a conflict of interest in reporting the matter to the Head). The Head should **not speak** to the member of staff who is the subject of the allegation at this point. In the absence of the Head the allegation should be reported to the Chair of Governors.

- 6.3 Where a safeguarding-related allegation or cause for concern is made against the Head or there is a conflict of interest in reporting the matter to the Head, it should be reported immediately to the Chair of Governors without informing the Head.
- 6.4 **In all cases immediate contact should be made with the LADO** to discuss the allegation. A decision as to how to proceed and eventually whether or not to suspend a member of staff or volunteer will be taken by the Head following consultation with the LADO (and, in the most serious cases, the police). In borderline cases discussions with the LADO can be held informally and without naming the School or individual. Where an allegation relates to a member of supply staff provided by an agency, the agency will be fully involved. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Suspension is not an automatic response and the decision will be taken according to the circumstances of each particular case, giving due weight to the views of the LADO, and guidance in *Keeping Children Safe in Education* and *Working Together to Safeguard Children*. The decision as to whether or not to suspend the Head is taken by the Chair of Governors alone (having consulted the relevant authorities).
- 6.5 In considering the available options, including redeployment of the member of staff, supply staff or volunteer, the LADO and the Head will ensure that their primary concerns are the safety and wellbeing of the pupils, together with the need for a full and fair investigation which will be led by the LADO, the police or the school under the LADO's guidance.
- 6.6 The School will refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, as outlined in para 2.2.7 above. The referral will be made as soon as possible, and ordinarily on conclusion of the investigation, when the individual is removed from regulated activity. In cases involving teaching staff, the School will also consider whether it would be appropriate to refer the matter to the Teaching Regulation Agency (TRA) who may decide to prohibit the individual from teaching.
- A referral to the TRA should be drafted and submitted by the Head of school after consultation with School Governors. The obligation to refer cases to the TRA is at an employer's discretion taking into consideration whether the conduct is sufficiently serious. The test of seriousness is whether an individual's behaviour is fundamentally incompatible with being a teacher. Each case will turn on its own facts but Alton School's broad approach (in line with guidance from the TRA) is that referrals should be made if a teacher is dismissed for gross misconduct and that conduct breaches Teachers' Standards or raises doubts about a suitability to work with children.
- Schools should keep a record of all referrals that are made, as well as of any borderline cases where the decision was ultimately made not to refer, together with the reasons for those decisions.
- 6.7 Where required to do so, the School will provide information to the DBS or TRA in respect of a member of staff or volunteer in accordance with its legal duty.
- 6.8 Communications with the School community about safeguarding-related allegations shall only be made following consultation with the LADO and any investigating authorities. There are restrictions on the reporting or publishing of allegations against teachers (which apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case). Every effort will be made to maintain confidentiality and guard against unwanted publicity.
- 6.9 If there has been a substantiated allegation against a member of staff, supply staff or volunteer, the School will work with the LADO to determine the next steps to be taken with regard to the individual as well as

whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

6.10 Low-level concerns

6.10.1 A low-level concern about the behaviour of a member of staff is one where such behaviour does not meet the 'harm threshold' and yet appears to be inconsistent with the staff code of conduct or professional boundaries.

6.10.2 It is crucial that any such concerns should be shared as soon as reasonably possible. This will maintain an open and transparent culture within the School, reinforcing its ethos and values; ensure that adults working in the School act within professional boundaries; and enable concerning, problematic or inappropriate behaviour to be identified and addressed early, minimising the risk of abuse.

6.10.3 Low-level concerns about a member of staff may be shared initially with the DSL or the Head. If the former, the DSL should inform the Head of any concern in a timely manner. Low-level concerns about the Head should be reported to the Chair of Governors. Staff are encouraged to self-refer where, for instance, they have found themselves in a situation which could be misinterpreted, or on reflection feel they may have compromised the School's expected professional standards. Reports about supply staff and contractors will be notified to their employers so that any potential patterns of inappropriate behaviour can be identified.

6.10.4 The Head (or a nominated deputy) will investigate the concern, speaking to the person who raised the concern, the individual involved, and any witnesses. The evaluation of the concern should always be undertaken in consultation with the LADO. Consultation with the LADO may be triggered by local thresholds for action or any doubt as to whether a low-level concern meets the harm threshold. The action to be taken will be determined by and proportionate to the nature of the incident, whether the report can be substantiated and whether any pattern of behaviour appears to be emerging. Support will be offered where appropriate and where needed to enable the member of staff in question to correct their behaviour in future.

6.10.5 The Head must record all low-level concerns in writing, including details of:

- The concern;
- The context of the report;
- The name of the individual sharing the concern (requests for anonymity should be respected as far as reasonably possible);
- Action taken and the rationale for this.

6.10.6 Records of low-level concerns must be reviewed periodically in order to identify any patterns of concerning, problematic or inappropriate behaviour. Should a pattern of behaviour be identified, the School will decide on a course of action depending on the nature of the concerns. This will include referral to the LADO if the harm threshold is met. The review of records will also consider whether these indicate any wider cultural issues in the School which should be addressed by revising policies or providing further training.

6.10.7 Further guidance on low-level concerns can be found in *Keeping Children Safe in Education* part 4 and in the schools Low-Level Concerns Policy.

7. Roles and Responsibilities

- 7.1 Every member of staff and every volunteer who assists the School should:
- 7.1.1 protect pupils from abuse
 - 7.1.2 follow the School's safeguarding policy and procedures, and read sections of *Keeping Children Safe in Education* appropriate to their role, including subsequent updates to this guidance
 - 7.1.3 know how to access and implement the procedures
 - 7.1.4 know the identity of the School's Designated Safeguarding Lead and who to speak to in the absence of the Designated Safeguarding Lead
 - 7.1.5 report all safeguarding concerns to the Designated Safeguarding Lead (subject to paragraphs 5.12.4, 6.2 and 6.3 of this Policy)
 - 7.1.6 keep a record of any safeguarding concern, conversation or incident (in accordance with paragraphs 3.2 and 5.11 of this Policy)
 - 7.1.7 undertake appropriate training as detailed in 2.2.2 above.

8. Referring Concerns to Social Services

- 8.1 The decision to make a referral is a serious matter and requires careful judgement. Such decisions should usually only be taken by the Head or by the Designated Safeguarding Lead, who will liaise with the Head as appropriate, following consultation with Social Services. In cases of serious harm, or if a crime may have been committed, the police will be informed from the outset. However, anyone can refer their concerns to local authority children's social care directly (see section 9 below).
- 8.2 Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.
- 8.3 Parental consent is not a requirement for referrals to statutory agencies. However, schools should aim to gain consent of individuals or their parents, depending on age and the circumstances, to share information about them with Social Services and other agencies. Schools should be mindful of situations where to do so would place a child at increased risk of harm. Schools may share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a school will gain consent, or if to gain consent would place a child at risk. Advice to determine the nature of any discussions to have with parents should be sought from Social Services in advance of making a referral.
- 8.4 In the case of concerns about a pupil being at risk of radicalisation, school staff should follow safeguarding guidelines by reporting to the Designated Safeguarding Lead. This may lead to a referral through the *Channel* programme.
- 8.5 In accordance with paragraph 5.12.2 of this Policy, where the disclosure relates to actual abuse or the suspicion of abuse, the Designated Safeguarding Lead will report the disclosure to Social Services within 24 hours.
- 8.6 In the event of the School making a referral to Social Services, they should agree with the recipient of the referral what exactly the child and parents will be told, by whom and when. The Designated Safeguarding Lead should ask to be kept informed of the timing of the strategy discussion between Social Services and the

police, which will decide whether and how to investigate. The Designated Safeguarding Lead should be prepared to contribute to the strategy discussion.

- 8.7 The local authority should make a decision within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. The referrer should follow up if this information is not forthcoming. A record of each contact with Social Services, including the name of the officer with whom the School has spoken, and the date and time of the call, should be kept. If after a referral the child's situation does not appear to be improving, the referrer should consider following local escalation procedures.

9. Duty to report concerns about the management of safeguarding

- 9.1 The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime, and feel confident that such concerns will be taken seriously by the senior leadership team. The duty to report concerns about the management of safeguarding is part of the Code of Conduct and will also be reflected in staff training.
- 9.2 Where staff or volunteers reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise concerns.
- 9.3 The member of staff or volunteer should bring their concerns to the attention of the Designated Safeguarding Lead, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Lead, to the Head.
- 9.4 However, where someone reasonably believes these reporting routes to be inappropriate, or has reported concerns and no action has been taken, they should contact the Chair of Governor, refer their concerns to local authority children's social care directly, or use the NSPCC whistleblowing helpline (see Appendix 1 for contact details).

10. Monitoring and Review

- 10.1 The working of this Policy will be monitored locally by the Designated Safeguarding Lead in the School who will report as required to the Head and to the SGB.
- 10.2 The SGB will undertake an annual audit visit and other periodic checks in order to monitor the effectiveness of the School's implementation of these policies and procedures, together with a review of the safeguarding incidents that have arisen and how they were managed.
- 10.3 The annual review will be reported back to the Governors responsible for Safeguarding. The Health and Safety Committee will also consider the processes in place for promoting the welfare of pupils.
- 10.4 The SGB acknowledges its overall responsibility in ensuring that this Policy is effective in its implementation and meets all current regulatory requirements. An annual review of this Policy and associated procedures, and the efficiency with which associated duties have been discharged, will be undertaken so that any deficiencies or weaknesses can be remedied without delay.
- 10.5 This policy was last reviewed and updated in August 2023 and will be reviewed again in the event of any significant changes or by September 2024 at the latest. The School's most recent safeguarding audit visit took place in November 2022.

Appendix 1

Further advice on child protection is available from:

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

- NSPCC whistleblowing: help@nspcc.org.uk tel: 0800 028 0285
- NSPCC sexual abuse in schools helpline: help@nspcc.org.uk tel: 0800 136 663
- CEOP: www.ceop.police.uk/ceop-reporting/
- DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counterextremism@education.gsi.gov.uk

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

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

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/#>

Sexual abuse in Education - Young people and adults can contact the NSPCC helpline, Report Abuse in Education on **0800 136 663** or email help@nspcc.org.uk

Appendix 2

Mental Health

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

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

The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing.

Children requiring mental health support

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. 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. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in schools guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people. See Rise Above for links to all materials and lesson plans.

<https://www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/depression-anxiety-mental-health/>

Appendix 3

Sharing Nudes and Semi-Nudes

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

‘Sharing nudes and semi-nudes’: definition

This advice uses the term ‘sharing nudes and semi-nudes’ to mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline.

The term ‘nudes’ is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’.

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

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

The advice covers:

How to respond to an incident of nudes and semi-nudes being shared including:

- risk assessing situations
- safeguarding and supporting children and young people
- handling devices and images
- recording incidents, including the role of other agencies
- informing parents and carers

The types of incidents which this advice covers are:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18

- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18

This advice does not cover:

- the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency.
- children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images

In response to these issues, education settings should follow their local authority's guidance and schools and colleges should also refer to the Department for Education's (DfE's) Keeping children safe in education statutory safeguarding guidance.

Appendix 4

Staff Procedures

Identifying and Recognising Abuse

School staff who have day-to-day contact with pupils are particularly well placed to observe outward signs of abuse such as changes in behaviour or developmental concerns. Staff are under an obligation to ensure that they are **alert** to signs of abuse and neglect, and to **question** the behaviour of children and parents/carers without necessarily taking what they are told at face value. They should make sure they know who to turn to if they need to **ask for help**, and that they **refer** concerns to the Designated Safeguarding Lead if they suspect that a child is at risk of harm or is in immediate danger. Safeguarding children is everyone's responsibility, and it is better to help children as early as possible before issues escalate and become more damaging. It is important not to let other considerations, like the fear of damaging relationships with adults, get in the way of protecting children from abuse and neglect. If you have concerns to report, you should view this as the beginning of a process of enquiry, not an accusation.

The identification of child abuse is almost always arrived at through piecing together a variety of factors, rather than there being one definite sign, symptom or injury. It is dangerous to assemble check lists of indicators of abuse in the belief that this will make identification simple and straightforward. The key is always one of context - for example, the site and type of injury, the age and development stage of the child, how the parent(s) said the injury happened, what the child said and so on. *Many children will exhibit some indicators of abuse at some time and the presence of one or more should not be taken as proof that abuse is occurring.* However, if you suspect abuse has occurred you must always speak to the Designated Safeguarding Lead.

There are some common areas, which may indicate the possibility of abuse. Remember though that they should never be taken on their own as absolute proof that abuse has occurred:

- Does their explanation tally with the injury sustained?
- Did they seek medical help within reasonable time scale?
- Is there a pattern of recurring injuries/problems with the child?
- What is the parents' general attitude towards the child?
- How do they react to you as a professional?

Bear in mind that some children may be more vulnerable to abuse. Children with disabilities, for instance, may be especially vulnerable because they may have an impaired capacity to resist or avoid abuse, or may have speech, language and communication needs which make it difficult to tell others what is happening.

Diagnosing child abuse is not a simple process. We know that child abuse does occur, and we must be willing, indeed have a duty, to take action to protect children from abuse. An awareness of possible indicators of child abuse means that we are more likely to be able to recognise it and help the child. Sometimes children may present with signs and symptoms of abuse. At other times there will not be obvious indicators. Some information on the signs of abuse is included in the school *Safeguarding Policy* (para 3.6).

Similarly, children's behaviour may give clues that they are or have been abused (although it should be remembered that children show signs of distress for other reasons too, e.g. divorce of parents, death of a family member).

Safeguarding incidents and/or behaviours should also be considered within the context in which they occur – that is, the wider environmental factors in a child’s life that may be a threat to their safety and/or welfare. Local authority children’s social care assessments should consider such factors so it is important to provide as much information as possible as part of any referral process. This will allow an assessment to consider all the available evidence and the full context of any abuse.

Categories of Abuse

Staff may become alerted to the possibility of child abuse by:

- Noticing signs and symptoms of abuse
- Allegations made by another person
- An admission from someone who says they are harming a child
- A child telling them or showing them that they have been mistreated.

The lists below are neither exclusive nor exhaustive.

Physical abuse

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

Emotional abuse

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

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching the outside of clothing. They may also include non-contact activities such as involving children in looking at or the production of sexual images, watching sexual activities encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect

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

Neglect can be more difficult to recognise and name in affluent families. Children living in comfortable houses who are well fed and have access to high quality education do not present the more typical evidence of neglect, and parents can use their financial and social capital to obstruct interventions. A useful study of identifying and addressing 'affluent neglect' can be found [here](#).

Children absent from education

Regular school attendance is crucial for children educationally, but also important for their social and emotional development. Furthermore, a child missing or persistently absent from an education setting can act as a vital warning sign of a range of safeguarding issues. This may include abuse and neglect and such children are at risk of being victims of harm, exploitation or radicalisation. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage. Staff should treat prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly.

It is a regulatory requirement for EYFS setting to have a written procedure to be followed in the event of a parent and/or carer failing to collect a child at the appointed time, or in the event of a child going missing at, or away from, the setting (Statutory Framework 3.74).

Promoting School Attendance

Schools should promote good attendance. Contact should be made with parents on the first day of an unauthorised absence and explanations for absence should be followed up rigorously when the child returns to school. Any concerns regarding these explanations should be reported to the Head/DSL (depending on the nature of the explanation).

Monitoring Absence

Class teachers and tutors should review the attendance record of the pupils for whom they are immediately responsible on a regular basis. Extended, regular or patterned absence from school can be an indicator of a wellbeing or safeguarding issue and should always be followed up. The attendance of pupils with known welfare and attendance concerns should be monitored particularly closely.

Types/patterns of absence of particular concern (e.g. those associated with FGM or forced marriage) will be covered in the school's regular safeguarding updates and further information can be found via links in *Keeping Children Safe in Education*.

The nature of action to be taken will depend on the age of the child and individual circumstances but may well involve:

- An initial confidential discussion with the pupil herself
- A discussion with parents

- A discussion with the year group/key stage lead, pastoral deputy, nurse or DSL

Any concern and action taken should be recorded in writing and a note placed on the pupil file.

Child-on-child abuse

Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). It can take various forms, including: serious bullying, relationship abuse, domestic violence, child sexual exploitation, youth violence, harmful sexual behaviour (see below), and/or gender based violence. It can happen both inside and outside of school and online. Even if there are no reports in the school, it does not mean it is not happening, it may be the case that it is just not being reported.

Abuse by another child or children should be taken as seriously as abuse perpetrated by an adult – don't be dismissive or set high thresholds. Child-on-child abuse, including verbal abuse, should be recognised as a potential safeguarding issue and never be tolerated or passed off as horseplay, teasing or 'banter'. Downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment and in worst case scenarios, a culture that normalises abuse, leading to children accepting it and not coming forward to report it.

The threshold for dealing with an issue of pupil behaviour or bullying under the safeguarding procedure is, subject to local specifics as in any other case, when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Also bear in mind that there may be a risk to young children / young people other than the current victim.

In cases of bullying (especially sexist, sexual and transphobic bullying due to the potential seriousness of violence), schools must always consider whether safeguarding processes need to be followed.

Key principles:

- Educate pupils to recognise and respond appropriately to child-on-child abuse
- Investigate any allegation of child-on-child abuse promptly and thoroughly
- Implement the safeguarding, behaviour and anti-bullying policies and procedures
- Seek advice from statutory agencies, and be prepared to make a referral if the case meets the threshold set by the local safeguarding partners
- Follow the advice for practitioners in *What to do if you're worried a child is being abused*
- A co-ordinated multi-agency approach is required
- Multi-agency assessment should be carried out in each case
- The needs of young people who abuse should be considered separately from the needs of the victim – and schools should be alert to the fact that a child who has harmed another child may themselves be a victim
- Good record keeping of related conversations, meetings, communications and any intervention is essential.

A young abuser should be the subject of a child protection conference (CPC) if s/he is considered personally to be at risk of continuing significant harm.

Sexual violence and sexual harassment between children

Detailed advice on this issue can be found in Part 5 of *Keeping Children Safe in Education*. Key points have been summarised below. However, the guidance itself should be referred to for more detailed information.

What is meant by sexual violence and sexual harassment?

- Sexual violence and sexual harassment can occur between two children **of any age and sex**, or between groups of children. All staff are advised to maintain an attitude of 'it could happen here'.
- Ofsted's Review of sexual abuse in schools and colleges revealed the prevalence of sexual harassment and online sexual abuse – the issues are so widespread that they need addressing for all children and young people.
- Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment. Girlguiding's Girls' 2021 Survey found that 67% of girls and young women aged 13-18 surveyed have experienced sexual harassment at school from another student, and that 29% first experienced sexual harassment when they were just 11-13 years old.
- Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future
- Children with SEND are three times more likely to be abused than their peers. Pupils who are LGBT or perceived to be LGBT are also likely to be more vulnerable
- Sexual violence refers to rape, assault by penetration or sexual assault or causing someone to engage in sexual activity without consent
- Sexual harassment is 'unwanted conduct of a sexual nature' and can include such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone, or displaying pictures or photos of a sexual nature; and online activity including sharing of images or video (sexting) or making inappropriate sexual comments (this list is not exhaustive)
- Sexual violence and sexual harassment exist on a continuum and may overlap
- Harmful sexual behaviours (HSB) in children are those which are developmentally inappropriate and may cause developmental damage. When considering HSB, ages and stages of the development of children are critical factors. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma and it is important that they are offered appropriate support
- When considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered.

A whole-school approach

- Sexual violence and sexual harassment should be included in the school's broader approach to safeguarding and should be clear and easy to understand for staff, parents and pupils
- It should be clear to all that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. Not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it
- Well promoted, easily understood and easily accessible systems should be in place for children to confidently report abuse, sexual violence and sexual harassment, knowing their concerns will be treated seriously and that they can safely express their views and feedback.
- Sexual violence and sexual harassment, and the wider societal context such as sexist stereotypes and language should be included in staff training and age-appropriate PSHE.

- Decisions and actions should be regularly reviewed and relevant policies updated to reflect lessons learnt; in particular, schools should look out for potential patterns of concerning, problematic or inappropriate behaviour and where a pattern is identified, consider whether there are wider cultural issues within the school that enabled inappropriate behaviour to occur and what can be done to minimise the risk of it happening again

Initial response to reports of sexual violence and sexual harassment

- Schools should prepare for possible incidents - for instance, by reviewing the specialist support potentially available
- Reports of sexual violence are often complex and require difficult decisions to be made – online concerns can be especially complicated
- It is important to note that children may not find it easy to tell staff about their abuse verbally. In some cases, the victim may not make a direct report. For example, a friend may make a report or a child's behaviour might indicate that something is wrong. Staff should act on any concerns about a child's welfare rather than wait to be told by the child in question
- Abuse that occurs online or outside the school should not be downplayed and should be treated equally seriously. The duty to safeguard pupils remains the same and the same processes for action will apply
- Staff should not assume that someone else is dealing with the incident and should discuss concerns with the DSL
- The initial response to a disclosure is important and schools should ensure the victim is taken seriously and supported. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report
- Victims may not disclose the whole situation immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. It may be helpful to ask the victim if they would like a designated trusted adult to talk to about their needs. The school may also need to protect the victim from bullying and harassment as a result of any report they have made
- Schools should act in the best interests of the child. The needs and wishes of the child should be paramount (along with protecting the child) in any response
- General safeguarding principles apply in responding to incidents. Where an incident occurs off site the school's duties remain the same
- Decisions are ultimately for a school to make on a case-by-case basis, with the DSL taking a leading role and supported by other agencies such as Local authority, children's social care or the police
- Schools should make a risk-and-needs assessment in cases of a report of sexual violence (the need for a risk assessment following a report of sexual harassment should be decided on a case-by-case basis). The assessment should consider the victim, alleged perpetrator, any witnesses and other children at the school, be recorded and kept under review.² See below
- A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that need addressing. Disciplinary action and support can and should occur at the same time if necessary. The school should be very clear as to which category any action they are taking falls into, or whether it is really both, and should ensure that such action complies with the law relating to each relevant category.

² Cases where a victim has been subject to abuse but does not want the matter reported to police can be particularly difficult to assess. In such cases this checklist may be helpful:
https://www.vvw.co.uk/images/documents/independent-schools/Checklist_for_reporting_peer_on_peer_allegations_against_a_pupil_s_wishes_-_tcc_-_642021.pdf

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology or by forcing children to watch sexual activities or behave in sexually inappropriate ways

Child sexual exploitation is a crime with devastating and long-lasting consequences for its victims and their families. Any child, in any community may be vulnerable to CSE: it affects both boys and girls from all ethnic groups. Some key points to bear in mind are:

- It can affect any child or young person under the age of 18, including 16 and 17 year olds who can legally consent to have sex
- It can involve force, violence or threats of violence, or enticement-based methods of compliance
- It may occur without the victim's immediate knowledge (e.g. through posting images on social media). Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship
- It can be perpetrated by individuals or groups, males or females, adults or children
- It can be a one-off incident or a series of incidents, and range from opportunistic to complex organised abuse
- The power imbalance typical of CSE may manifest itself in different ways: for example age, gender, sexual identity, cognitive ability, physical strength, status etc.

Children rarely self-report CSE, so it is important that practitioners are aware of potential indicators of risk, including:

- Unexplained gifts or new possessions
- Association with other young people involved in exploitation
- Isolation from peers/social networks
- Relationships with controlling or significantly older individuals or groups
- Concerning use of the internet and other social media
- Excessive receipt of texts/phone calls, multiple callers
- Inappropriately sexualised behaviour for age, sexually transmitted infections or pregnancy
- Changes in emotional well-being;
- Increased secretiveness
- Misuse of alcohol and other drugs
- Going missing for periods of time or regularly coming home late; and
- Regularly missing school or education or not taking part in education.

However, CSE can occur without any of these risk indicators being obviously present.

Detailed non-statutory guidance on CSE can be found at

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Some informative short films on CSE have been made available by the University of Bedfordshire at

<https://www.beds.ac.uk/ic/films>

Child Criminal Exploitation

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. CCE can include children being forced to work in cannabis factories, to shoplift or pickpocket, to commit vehicle crime, to threaten other young people, or to move drugs or money across the country (referred to as county lines – see below). They may be coerced into carrying weapons such as knives, or begin to carry a knife for a sense of protection. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, and they are not treated as victims despite the harm they have experienced.

CCE can affect a child or young person or vulnerable adult and is still exploitation even if the activity appears consensual. It can involve force or enticement-based methods together with threats of violence or actual violence. It does not always involve physical contact; it can occur through the use of technology. It can be perpetrated by individuals or groups, males or females and young people or adults. It typically involves some form of power imbalance, including gender, cognitive ability, physical strength, status and access to economic or other resources.

Whilst young people aged 15-16 years old are most commonly exploited, children as young as 12 are known to be exploited by gangs to act as drug couriers. Both males and females are exploited, and it is important to note that the experience of girls who are criminally exploited can be very different to boys and the indicators may not be the same. Both boys and girls being criminally exploited may be at higher risk of CSE.

Factors that heighten a person's vulnerability include:

- having poor experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a physical or learning disability
- having mental health or substance misuse issues
- being in care (particularly those in residential care and those with interrupted care histories)

Some indicators of CCE involvement and exploitation include:

- persistently going missing from school or home and/or being found out-of-area
- unexplained acquisition of money, clothes or mobile phones
- excessive receipt of texts/phone calls
- relationships with controlling/older individuals or groups
- leaving home/care without explanation
- suspicion of physical assault/unexplained injuries
- misusing alcohol and other drugs
- parental concerns
- carrying weapons
- significant decline in school results/performance

- association with other young people involved in exploitation or isolation from peers or social networks
- self-harm or significant changes in emotional well-being

If you are concerned about a child you should follow your local safeguarding partner procedures. If you believe a child is at immediate risk of harm you should contact the police.

NSPCC Childline and Mind can be sources of support for young people.

County Lines

County Lines Exploitation is the police term for gangs supplying drugs using dedicated phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK – no specified distance of travel is required. It involves child criminal exploitation as the gangs use children and vulnerable people to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Social media is also being used increasingly for recruitment. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. The gang may establish a base by taking over a vulnerable adult's home. Issues involved include drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons.

Indicators for CSE and CCE as detailed above may be applicable to involvement in county lines.

The full guidance can be accessed here: [Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance](#)

If you are concerned about a child being at risk of county lines exploitation, you should follow local safeguarding guidance and share the information with local authority social services. If you believe a person is at immediate risk of harm you should contact the police.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Schools recruiting international pupils should be aware of the risk of being used as a conduit for trafficking, whereby criminals obtain Child Student/Student (Tier 4) visas sponsored by independent schools for children who then go missing within weeks or months of arriving in the UK. Such children are at risk of exploitation.

A pupil on a Child Student/Student visa going missing should be reported to the relevant authorities including the local authority, the police and UKVI.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer to the National Referral Mechanism is available here: <https://www.gov.uk/government/collections/modern-slavery>

Violence against Women and Girls (VWAG)

VWAG is an umbrella term which encompasses any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women or girls, including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or in private life. It encompasses violence against women within the family, within the general community, and that perpetrated or condoned by the State, wherever it occurs. Some of the more common forms of VWAG include domestic abuse, sexual harassment and bullying, sexual exploitation, sexual assault and FGM. It can impact on people from all backgrounds, ethnicities, religions, disabilities, ages, sexualities, social economic classes and gender identities. Other useful sources of information include the Home Office Strategy for [Tackling Violence against Women and Girls](#), and the [Ask Ava](#) website.

Domestic Abuse

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

- psychological
- physical
- sexual
- financial, and
- emotional

It is estimated that one in five children are exposed to domestic abuse. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Children witnessing domestic abuse is recognised as ‘serious harm’ in law. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse can also be a sign that children are suffering another type of abuse or neglect.

Domestic abuse can be difficult to identify as children often learn to keep their feelings to themselves and may feel like violence in their home life must be kept secret. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Young people experience the highest rates of domestic abuse of any age group and 95% of young people experiencing abuse within their intimate relationships are female³.

Operation Encompass operates in the majority of police forces across England. The system ensures that when police are called to an incident of domestic abuse, where the children in the household who have experienced the incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day so that the school can arrange for appropriate support. Further information can be found on the website: <https://www.operationencompass.org/>

³ SafeLives Children’s Insights data. The full report can be found at <http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

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

To talk through your concerns call:

Hampshire Domestic Abuse Helpline on 0330 016 5112 or talk to your local outreach service.

East Hampshire Domestic Abuse Services - Covering Reigate & Banstead, Mole Valley and Tandridge
- 01737 771350

Your Sanctuary Outreach Service Covering Woking, Runnymede and Hampshire Heath - 01483
776822

North Hampshire Outreach Service - Covering Epsom & Ewell, Elmbridge and Spelthorne - 01932
260690

South West Hampshire Outreach Service - Covering Guildford and Waverley - 01483 577392

National Domestic Abuse Helpline 0808 2000 247 (24 hours)

<http://www.nationaldomesticviolencehelpline.org.uk/>

The website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe call from the team can be booked.

Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community. This includes FGM, forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and children's social care.

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK, as is taking a British national or permanent resident abroad for FGM or helping someone to do this. It has been estimated that over 20,000 girls under the age of 15 are at risk of FGM in the UK each year and that 66,000 women in the UK are living with the consequences of FGM. Most of the women and girls from practising communities live in the major UK cities, including London, Manchester, Sheffield, Liverpool, Birmingham and Cardiff. The girls may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to 'heal' before they return to school. There are also worries that some girls may have FGM performed in the UK.

Schools have a legal duty to safeguard children at risk and FGM is a form of child abuse with long-lasting harmful physical and emotional consequences. Girls who are threatened with or who have undergone FGM may withdraw from education, restricting their educational and personal development. Any indications that FGM is a risk, is imminent or has already taken place will be dealt with under the child protection procedures in the Safeguarding and Child Protection Policy. In support of this provision, schools are advised to raise awareness of FGM among staff, ensure that sources of information and advice are available to both staff and pupils (including signposts for accessing

additional help, e.g. the NSPCC's helpline, ChildLine services, and appropriate black and ethnic minority women's groups), include FGM in the curriculum in relevant classes and create an open environment in which girls feel able to discuss such concerns without inhibition.

There is a range of potential indicators that a girl may be at risk of FGM, including:

- Being in a family where other members have undergone FGM
- Parents withdrawing the girl from PSHE or learning about FGM
- Parents planning to take the girl out of the country for a prolonged period
- A girl appearing anxious, depressed and withdrawn and her educational performance, aspirations or motivation declining
- A girl confiding that she is to have a 'special procedure' or attend a special occasion to 'become a woman'

Further information on warning signs can be found in the statutory guidance at

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

There is also a resource pack available:

<https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack/female-genital-mutilation-resource-pack>

A leaflet provided by the Home Office:

<https://www.gov.uk/government/publications/female-genital-mutilation-leaflet>

And guidance for schools produced by the National FGM Centre:

<http://nationalfgmcentre.org.uk/wp-content/uploads/2019/06/FGM-Schools-Guidance-National-FGM-Centre.pdf>

If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

- not to reveal to anyone other than the Designated Safeguarding Lead that their enquires might be related to FGM as this could increase risk to the pupil
- not to engage initially with the pupil's parents or family or others within the community
- to alert the Designated Safeguarding Lead to their concerns immediately. This member of staff will then activate local safeguarding procedures, liaising with the police and children's or adults' social care. If a pupil has disclosed that she is at risk in this way the case will still be referred to social care, even if it is against the pupil's wishes. In all situations the girl should be offered counselling and medical help and an assessment should be made of other related females who may be at risk.

For further information on what to do if there are concerns that a student may be at risk of or has undergone FGM, or if a student stops attending school, see Chapter 9 of the Multi-Agency Practice Guidelines.

From October 2015, it became a statutory duty on teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Unless a teacher has good reason not to, they should still consider and discuss any such case with the DSL and involve Local authority children's social care as appropriate.⁴

⁴ A factsheet on the new duty can be found at

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

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

Further information and support materials can be found at:

- <https://www.gov.uk/government/collections/female-genital-mutilation>
- NHS Choices <http://www.nhs.uk/Conditions/female-genital-mutilation/Pages/Introduction.aspx>
- Foundation for Women’s Health Research and Development (FORWARD) at <http://www.forwarduk.org.uk>

Forced Marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage (including non-binding, unofficial ‘marriages’ as well as legal marriages). Threats can be physical or emotional or psychological. In addition, since February 2023 it has been a crime to carry out any conduct the purpose of which is to cause a child to marry, legally or unofficially, before their eighteenth birthday, even if violence, threats or another form of coercion are not used. Further information can be found in the [government guidance](#).

Other specific safeguarding issues

Guidance on other specific safeguarding issues (including fabricated or induced illness, faith abuse and teenage relationship abuse) can be found via the GOV.UK website – links can be found in *Keeping Children Safe in Education* Annex A. The TES website and NSPCC website are other good sources of information.

Impact of Abuse

Abuse in all its forms can affect a child at any age from nursery stage to sixth form. It is well documented that pupil performance and behaviour can be adversely affected. The effect can be so damaging that the consequences are felt throughout a person’s life. For example, an adult who was abused as a child may be unable to, or have great difficulty in, sustaining stable trusting relationships or may develop an excessive and harmful use of drugs or alcohol. The adverse effects of abuse can be helped considerably by an appropriate response to handling disclosures by the professionals involved, therapeutic and/or professional support if required and, importantly, family support.

Historical Abuse

Reports of abuse that happened in the past still need to be reported. A pupil reporting “historical abuse” may benefit from family support and may need specific therapeutic/professional help. In addition, child protection agencies will need to consider whether or not to conduct a child protection investigation, as a crime may have been committed and other children with whom the alleged abuser is (or has been) living or working may have been abused or be at risk of significant harm.