



CHILD PROTECTION AND SAFEGUARDING POLICY

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1. Introduction

1.1 The safety and welfare of students is of the utmost importance across all schools in the Girls' Learning Trust (GLT). All adults working in the Trust must be vigilant in protecting children from harm and abuse and be aware that any student may be at risk of harm or abuse. All adults working within the Trust have a duty to safeguard and promote the welfare of all students under the Education Act 2002, Children's Acts of 1989 and 2004, *Keeping Children Safe in Education* (Sept 2021) and *Working Together to Safeguard Children* (HM Government 2018), through identifying any child welfare concerns and taking action to address them in partnership with families and other agencies where appropriate. At all times Trust staff must work in the best interests of the child.

Links to all referenced documents can be found in **Appendix D**.

1.2 In addition to this Child Protection and Safeguarding Policy, there are other policies and procedures (at both Trust and School level) to cover the roles of staff, students and parents/carers in respect of health and safety, student discipline, student attendance and equality and diversity matters. The Trust also ensures that issues of child protection are raised with students through the Personal, Social, Health, Citizenship Education (PSHCE) curriculum following the DfE 2020 statutory guidance. This policy applies to all staff, Trustees, Governors and volunteers working in the Trust and students and parents/carers are informed about this and other policies on each school's website. There are a number of elements to this policy:

- 1.2.1 Ensuring safe recruitment practice in checking the suitability of all staff and volunteers to work with children;
- 1.2.2 Raising awareness of child protection issues amongst all staff and volunteers and of what to do if they have concerns;
- 1.2.3 Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- 1.2.4 Developing effective links with relevant agencies and co-operating as required with their enquiries regarding child protection matters including attendance at case conferences and core group meetings;
- 1.2.5 Establishing and maintaining a safe environment in which children feel secure, recognise when they are at risk and are encouraged to talk freely about anything that concerns them and seek help when needed;
- 1.2.6 Ensuring children know there are adults in the School whom they can approach if they are worried about anything;
- 1.2.7 Including opportunities in the PSHCE curriculum to develop and equip students with the skills needed to recognise risks and stay safe from abuse;

- 1.2.8 Supporting students who have been abused or who may be at risk of significant harm in accordance with any agreed child protection plan;
 - 1.2.9 Ensuring an appropriate response to any concern or allegation about a member of staff or volunteer;
 - 1.2.10 Ensuring staff follow accepted 'safe practice' principles when working with students;
 - 1.2.11 Ensuring all staff and students are fully aware of the dangers of radicalisation;
 - 1.2.12 Ensuring all staff and students are fully aware of the dangers of CSE (child sexual exploitation) and criminal exploitation (eg 'county lines');
 - 1.2.13 Ensuring all staff and students are fully aware of the dangers of FGM (female genital mutilation).
 - 1.2.14 Ensuring all staff and students are fully aware of the dangers of so-called honour-based violence;
 - 1.2.15 Ensuring all staff and students are fully aware of the various forms of peer-on-peer abuse including incidents of sexually abusive behaviour and abuse of SEND students;
 - 1.2.16 Ensuring all staff and students are aware of the additional safeguarding vulnerabilities of students with SEN and/or disabilities;
 - 1.2.17 Ensuring that student attendance is monitored, that two emergency contacts are held for each student and that student absence is followed up in accordance with the attendance and punctuality policy of each School in the Trust and the *Children Missing Education* statutory guidance:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf
 - 1.2.18 Ensuring all staff read and understand Part 1 and Annex A of HM Government guidance - *Keeping children safe in education* (DfE Sept 2021):
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE_2021_September.pdf
- 1.3 If there are Child Protection concerns the **London Child Protection Procedures (6th Edition, London Safeguarding Children Partnership, 2020)** must be followed (available on request from the School, and also available from the Designated Safeguarding Lead (DSL). It can also be found at <http://www.londoncpc.co.uk/>. The Sutton Local Safeguarding Children Partnership (LSCP) has adopted these procedures. This policy and procedure also accords with:
- 1.3.1 HM Government guidance – *Keeping children safe in education* (DfE Sept 2021);
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE_2021_September.pdf
 - 1.3.2 *Working Together to Safeguard Children (HM Government, 2018)*
[Working together to safeguard children - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/432464/Working_together_to_safeguard_children_-_2018.pdf)

- 1.4 If lower-level concerns or needs (eg vulnerable students requiring 'Early Help') are identified for any particular student, then the Sutton Common Assessment Framework (flowchart available at www.sutton.gov.uk) should be followed. This is available through the DSL, their Deputy or the Head of Year teams in each school. Referral may then be made to the MASH team in the appropriate local authority.
- 1.5 If a child is identified as a 'Child Missing Education' (CME) then the statutory guidance found in Appendix E will be followed as per the Attendance and Punctuality Policy.

2. Definitions

2.1 **Safeguarding and promoting the welfare of students** is defined as:

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

2.2 **Children** includes everyone under the age of 18

Parents/carers refers to those with legal parental responsibility.

2.3 **Definitions of Abuse (Children)**

2.3.1 Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

2.3.2 Physical abuse

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

2.3.3 Emotional Abuse

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

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

2.3.4 Sexual Abuse

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

2.3.5 Sexual Harassment and Sexual Violence

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of this guidance, all staff working with children are advised to maintain an attitude of 'it could happen here'.

2.3.6 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2.3.7 Peer Abuse

In addition peer-on-peer abuse may occur which may involve any of the above forms of abuse and it is important if staff have any concerns regarding peer on peer abuse they should speak to their DSL (or deputy). This will be dealt with as with any other safeguarding matter or in accordance with the individual School's anti-bullying policy. More detail on the identification of, and support for, peer-on-peer abuse can be found in Appendix E.

Specific Safeguarding Issues

Safeguarding action may be needed to protect children and learners from specific safeguarding issues such as:

- Abuse: Neglect, physical, sexual and emotional;
- Disguised compliance;
- Children missing in Education (CME);
- Children who are home schooled ('Hidden Children');
- Radicalisation / extremism;
- So-called 'Honour Based' Abuse;
- Breast Ironing;
- Mental health concerns including self-harm (See: Appendix B for definitions);
- Bullying including on-line (cyber) bullying and prejudice-based bullying;
- Racism, disability, homophobic or transphobic abuse;
- Gender based violence/violence against women and girls;
- Domestic Abuse;
- Poor parenting;
- Child sexual exploitation (CSE);
- Child Criminal exploitation (CCE);
- The impact of new technologies on sexual behaviour;
- Substance misuse;
- Female Genital Mutilation (FGM);
- Forced marriage;
- Fabricated or induced illness;
- Faith abuse;
- Private fostering;
- Sexting (non-consensual sharing of nudes and semi-nudes' (images or videos)
- Peer on peer abuse/harms;
- Teenage relationship abuse;
- Transferable risk involving Sixth form Student
- Serious Violent Crime (including gang violence and knife crime);
- Sexual violence (See: Appendix C for definitions);
- Sexual harassment (See: Appendix C for definitions);
- Sexual violence and harassment (harmful sexual behaviour) between children, including sexting (sending nude and semi-nude images and/or videos) and up skirting
- Children with family members in prison;
- Children and the court system;

- Homelessness;
- Adverse Childhood Experiences (ACEs);
- Trauma and Attachment issues;
- Upskirting;
- Knife Crime;
- County Lines;
- Child abduction and community safety incidents;
- Modern Slavery;
- Cyber crime.

See **Appendix E** for further safeguarding definitions

3. Child Protection Procedures

Staff should follow the Child Protections Procedure found in Appendix B for concerns relating to any type of physical, sexual, emotional abuse or neglect. This includes sexting, CCE, CSE, FGM, radicalisation, forced marriage, so-called honour-based abuse upskirting and peer-on-peer abuse including sexual violence and sexual harassment (see appendix E for further information).

Any member of staff who becomes aware of a private fostering arrangement must inform the DSL who will inform the local authority. Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more.

3.1 Concerns About a Child

3.1.1 Contact with the family should be discussed with the DSL, who may consult the relevant local authority ie CFCS for Sutton or Multi Agency Safeguarding Hub for other boroughs(MASH).

3.1.2 In cases where a minor physical injury causes concern, it is usual Trust and school practice to discuss this with the parent or carer. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the student from harm), the student (as appropriate), parent or carer should be informed that the matter must be referred to the MASH. In cases of possible neglect or emotional abuse, the concern may have built up over a period of time. There may have been discussion previously between school staff and the family about sources of help but if concerns persist, the DSL will need to refer to the MASH and will normally advise the family of this.

3.1.3 **In cases where there are suspicions of abuse, the DSL may seek immediate advice from the Multi Agency Safeguarding Hub (MASH) before discussing this with the family.**

3.2 Recording

3.2.1 All records relating to child welfare concerns will be kept on CPOMS.

3.2.2 Where there are concerns about a student, everything should be recorded in writing as soon as possible after disclosure. A Child Protection file may be opened and must be (if paper) easily distinguishable and separate from others where there are no concerns. Electronic files will be linked to CPOMS.

3.2.3 The School will keep written and electronic records of any concerns about students, even where there is no need to refer the matter immediately.

3.2.4 Information from records will only be accessed by staff on a "need to know" basis.

3.2.5 Key staff will need to know when a student is subject to a Child Protection Plan or is a Child in Need (CIN), so they can monitor the student's welfare.

3.2.6 Records relating to the student's welfare will remain on the student's file as long as the student is a student at the School.

3.2.7 When the student leaves the School, the new school or college will be advised in writing that their records contain information about child protection concerns even where these are no longer current. Records should be sent to the new school or college in a way that is lawful in terms of the requirements of the General Data Protection Act.

3.3 Concern about a staff member, supply staff, carer or volunteer

3.3.1 Allegations or concerns about a member of staff, worker or volunteer must immediately be notified to the Headteacher (or the CEO, if the concern is about the Headteacher). If the concern is about the CEO then the Chair of the Trust Board should be notified. Staff must be aware that they can contact the LADO directly if their concern relates to the Headteacher or CEO. See whistleblowing policy

Low level concerns ref whistleblowing

3.3.2 The Headteacher, CEO, (or Chair of Trust Board), or Trustee with safeguarding responsibility will always consult the Local Authority Designated Officer (LADO).

3.3. Following consultation, the Headteacher, CEO, (or Chair of Trust Board) will decide on appropriate action:

3.3.3.1 immediate referral to the LADO;

3.3.3.2 consideration of disciplinary proceedings.

3.3.4 It is important to bear in mind that although the concern may relate to an individual student, other students may also be at risk.

- 3.3.5 When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the Independent Safeguards Authority (ISA) for consideration of the case (now part of the Disclosure Barring Service).
- 3.3.6 If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed. Alternatively, refer to the Trust Whistleblowing Policy.
- 3.4 Harm from/to other children or where there is a concern of transferrable risk
 - 3.4.1 Abuse or concerns about a risk of abuse or harm by other young people are subject to the same safeguarding procedures as in respect of young people being abused by an adult.
 - 3.4.2 Professionals responding should be alert to the risk a child may pose to children other than any “current” victim.
 - 3.4.3 Young people who harm others are likely to have considerable needs themselves (e.g. they may have been subjected to abuse, witnessed domestic violence or committed criminal offences).
 - 3.4.4 In such cases there will usually be a need to refer the alleged perpetrator of harm to the MASH.
- 3.5 Foreign exchange visits

Children on foreign exchange visits typically stay with a family selected by the school in the host country (the “Partner School”) and are vulnerable for reasons comparable to others living away from home. When working with Partner Schools, it will not be possible for DBS checks to be obtained for host families abroad, as the DBS does not reach beyond the UK.

The school will verify that the Partner School has a suitable vetting procedure in place to assess the suitability of home placements and should confirm that these checks have been properly conducted. If Partner Schools do not, or are unwilling, to carry out suitable checks on host families the exchange should not go ahead.

In the event that student's family is the subject of a Section 47 Enquiry (of the Children Act 1989) or a child in the family is subject to a Child Protection Plan, the family should be regarded as unsuitable to receive a student from an overseas school. Where there have been past concerns in the home that are known to the school, the nominated teacher should consult with the Designated Safeguarding Lead to agree whether further information is required prior to agreeing the suitability of the family to receive an overseas student.

3.6 Requests for assistance by other agencies

- 3.6.1 School staff have a legal duty to assist local authority Social Care Services or

the Police when they are making enquiries about the welfare of students.

3.6.2 Information about a student must therefore be shared on a "need to know" basis with other agencies.

3.6.3 When telephone requests for information are received, **always** maintain security by checking the telephone number listing for the caller and calling back to a switchboard number **before** giving information or confirming the student is on the School roll.

3.6.4 Always advise the DSL about such requests for information.

3.6.5 Requests for attendance at meetings about individual students (e.g. child protection conferences) should be notified to the DSL, who will arrange preparation of a report and attendance at the meeting.

3.6.6 Reports should contain information about the child's:

- academic progress
- attendance
- behaviour
- relationships with children and adults
- family
- any other relevant matter

3.6.7 Reports should be objective, distinguishing between fact, observation, allegation and opinion'

3.6.8 Reports will normally be made available to the student's family, unless the DSL has specified otherwise.

3.7 Students subject to a Child Protection Plan

3.7.1 The School will be told by the relevant local authority Children and Family Social Work Service when a student is subject to a Child Protection Plan (previously the Child Protection Register), whether the London Borough of Sutton or another local authority.

3.7.2 The name of the key social worker must be clearly recorded on the student's record.

3.7.3 The School will participate fully in the work of Core Groups for these students, to assist with the objectives of the Child Protection Plan for the student.

- 3.7.4 When a student is subject to a Child Protection Plan, the School will report all unexplained absences to the Key Social Worker, even if only of a day.
- 3.7.5 When a student is subject to a Child Protection Plan, the School will report all behavioural changes or other concerns to the key social worker; and
- 3.7.6 When a student who is subject to a Child Protection Plan leaves the School, all the child protection information relating to that student will be transferred to any new school.
- 3.7.7 Host families of overseas children while they are in the UK will be subject to DBS and other relevant safeguarding checks
- 3.8 General Issues

All staff across the Trust must observe the above policy and procedure at all times.

Each term, both the LGB and the Trust Board will receive a report on safeguarding as part of the Headteacher or CEO Report.

This policy will be reviewed by the Trust Board annually and final approval given by the Trust Board.

4. Recognition

The first indication of concern about a student's welfare is not necessarily the presence of a serious injury. Any combination of indicators of concern could indicate wider environmental factors that may be a threat to their safety and/or welfare. Concerns may be because of:

- bruises or marks on a student's body;
- remarks made by the student, another student, a parent/carer or another adult;
- observations of the student's behaviour;
- unexplained changes in the student's behaviour or personality;
- evidence of disturbance or explicit detail about abuse or possible abuse in a student's play, drawing or writing;
- evidence of neglect, failure to thrive or exposure to unnecessary risks;
- unauthorised absence from school;
- information about the parent(s) / carer(s) of the child or their home background;
- misuse of information technology e.g. sexting, inappropriate comments on social media, cyber bullying and online grooming.

Information on recognising the specific signs and symptoms of Child Sexual Exploitation (CSE), radicalisation and female genital mutilation (FGM) can be found in Appendix E.

5. Designated Staff for Child Protection

- 5.1 Each school in the Trust has a **Designated Safeguarding Lead (DSL)** with the role defined in a job description, although the lead role of the DSL will not be delegated. In addition, there is a nominated Trustee (from the Trust Board) for safeguarding and a nominated Governor (from each Local Governing Body). Details of these postholders can be found in Appendix A. All staff in the Trust must understand the role of the DSL.

Any member of staff concerned about a student must tell the DSL immediately or, in their absence, whoever is deputising, or the Headteacher of the School in accordance with the School child protection procedures in Appendix B.

The DSL has a responsibility to:

- 5.1.1 liaise with the nominated governor, the local authority Education and social care, police and other agencies on individual child protection cases;
- 5.1.2 act as the contact person within the School, providing advice and support and ensuring that all staff (including temporary, supply staff and volunteers and members of the governing body) are aware of their role;
- 5.1.3 be responsible for co-ordinating action within the School on child protection issues;
- 5.1.4 discuss individual cases with staff on a “need to know basis” to protect children's right to confidentiality;
- 5.1.5 oversee the planning of any curricular or other provision in relation to child protection matters;
- 5.1.6 with any other relevant staff (e.g. class teacher, tutor, and year head), represent the School at child protection meetings and be a member of a “Core Group” or other external agency meetings if required;
- 5.1.7 ensure staff are familiar with this Trust Policy and any School procedures, the London Child Protection Procedures, and Department of Education guidance;
- 5.1.8 raise awareness about child protection and safeguarding to the school community on an on-going basis;
- 5.1.9 together with the Headteacher and Local Authority Education Safeguarding Manager, arrange regular child protection training for **all** (i.e. including contractors) and induction sessions for new staff. This should also include Trustees and Governors
- 5.1.10 All staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. These should include:
 - the child protection policy;
 - the behaviour policy;
 - the staff code of conduct;
 - the safeguarding response to children who go missing from education; and
 - the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)
- 5.1.11 ensure that they (the DSL and the deputies) receive update training at least annually via the Sutton Designated Persons Network; and
- 5.1.12 give opportunities for staff to contribute to, and shape, safeguarding

arrangements and the Child Protection & Safeguarding Policy and also provide regular updates. This should also include Trustees and Governors.

5.1.13 report termly on safeguarding to the Trust Board and the Local Governing Body.

5.1.14 help promote educational outcomes by sharing, on a need to know basis, the information about the welfare, safeguarding and child protection. Including ensuring that the school staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

5.2 The Headteacher in each school (or the CEO of the Trust in their absence) has a responsibility to act in loco parentis. In the course of an investigation, social care or police might wish to speak to a child without parental knowledge or consent. The Headteacher has discretion to sanction this to allow the authorities to explore concerns and to determine whether there are grounds for further action. In these cases the Headteacher will ensure that the child's welfare is secured and the child has access to a trusted adult.

5.3 The Headteacher in each school (or the CEO of the Trust in their absence) will not allow a child to be removed from the School premises without either:

5.3.1 parental consent;

5.3.2 an order of the Court or a Police Protection Order, or

5.3.3 the child's own consent (providing the child is deemed by the Headteacher to be of an age of understanding to give informed consent and in the opinion of the Headteacher they have sufficient maturity to understand what is involved and sufficient understanding to be capable of making up her own mind on the issue).

6. The Role of Individual Staff

6.1 Everyone across the Trust must be alert to the possibility that any student could be the victim of abuse or neglect and must be familiar with these procedures. Concern about a student must be discussed with the DSL immediately so that if necessary, a referral can be made without delay.

6.2 Members of staff should **not** investigate child protection concerns. This is done by social care or the police. However, if a student says something, it is vital to listen carefully, so you can record and report it accurately. Records will also assist other members of staff who may have concerns.

6.3 To attend all safeguarding training provided by the school and ensure appropriate knowledge and understanding of key documents.

7. Confidentiality of Records

- 7.1 Students and their parents/carers have the right to expect all staff to deal sensitively and sympathetically with their situation. It is important that information is only available to those who need to know it. Parents/carers and, where appropriate students, should be told their right to confidentiality may be breached if information comes to light suggesting possible harm to a child/young person. Child protection issues relating to individual cases must not be subject to open discussion in the staff room or elsewhere in the School.
- 7.2 Members of staff should also remember not to promise to students to keep secrets where a safeguarding matter is concerned.
- 7.3 The Trust GDPR Policy and Freedom of Information Policy outlines the Schools' duties with regards to confidentiality and information sharing. However, Keeping Children Safe in Education (2021), paragraph 78 states: 'The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.' In addition paragraph 80 states: 'This includes allowing practitioners to share information without consent.'

8. Working with Children

- 8.1 It is recognised that young people who are abused, neglected, or who witness abuse or neglect may find it difficult to develop a sense of self-worth. They may feel helpless, humiliated and a sense of blame. The schools in the Trust may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The Trust and each school will endeavour to support the students through:
 - 8.1.1 the content of the curriculum;
 - 8.1.2 the Trust and each school's ethos, which promotes a positive, supportive and secure environment and gives students a sense of being valued;
 - 8.1.3 the School policy that relates to behaviour and use of devices on school premises, which is aimed at supporting vulnerable students in the School; the School will ensure that students know that some behaviour is unacceptable and that they are valued and not blamed for any abuse which has occurred;
 - 8.1.4 liaison with other agencies that support students such as social care, the child and adolescent mental health service, the borough school attendance service and the educational psychology service; and
 - 8.1.5 ensuring that, where a student with a child protection file leaves the School, their information is transferred to any new school immediately and that the social worker is informed.

8.2 Vulnerable groups

Early Help

Every family can go through difficult or challenging times at some point during their lives. If you are aware of a family that is experiencing problems, they may require support to help them to deal with difficult situations and make things better. Early Help services and support should be offered as soon as a problem or difficulty starts. This is to stop things from getting worse, and to make sure that the family gets the help that they need. The Early Help Assessment Tool (EHAT) is used to find out about the family so that we can understand the difficulties that they may be experiencing. The EHAT is used when a family would like support to help them with a difficulty; when a professional working with a family recognises that they may require extra support; when a family have lots of professionals working with them and services and information needs to be organised to help make things clearer for them; where the needs of the family are unknown or unmet. The EHAT is entirely consent based and the family can decide at any point that they no longer wish to engage with the process. An EHAT is confidential except where there is a risk of serious harm to a child or young person. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

CIN (Child in Need)

Child in Need Plan is formed alongside the family and Social care to provide the family and the young person the support needed this is done with the consent of the parents. Children in need are defined in law as children who are aged under 18 and: need local authority services to achieve or maintain a reasonable standard of health or development. need local authority services to prevent significant or further harm to health or development.

CP (Child Protection)

A child may be the subject of a child protection plan (CPP).

The child protection plan sets out:

- how social workers will check on the child's welfare
- what changes are needed to reduce the risk to the child
- what support will be offered to the family.

A core group is responsible for making sure that the child protection plan is supporting the child effectively on an ongoing basis. The members of this group include the person who has been nominated as the Lead Professional, the child and their parents/carers, and they report about this at child protection case conference (CPCC) meetings. The core group should be set up within 15 days of the initial child protection case

LAC (Looked After Children)

A child who has been in the care of their local authority for more than 24 hours is known as

a looked after child. Looked after children are also often referred to as children in care, a term which many children and young people prefer.

There are a variety of reasons why children and young people enter care.

- The child's parents might have agreed to this – for example, if they are too unwell to look after their child or if their child has a disability and needs respite care.
- The child could be an unaccompanied asylum seeker, with no responsible adult to care for them.
- Children's services may have intervened because they felt the child was at significant risk of harm. If this is the case the child is usually the subject of a court-made legal order.

A child stops being looked after when they are adopted, return home or turn 18.

9. Recruitment, Selection, Training and Supervision of Staff and Volunteers

9.1 STAFF EMPLOYED BY THE TRUST

The GLT Safer Recruitment Procedure will follow the process outlined in GLT HR Procedures and using guidance set out in KCSIE 2021.

9.2 In the recruitment and selection of staff and volunteers the School will at all times adhere to the Government guidance contained within *“Working Together to Safeguard Children” (HM Government 2018)* and *“Keeping children safe in education” (DfE Sept 2021)*

9.3 We will ensure that our interview panels contain at least one safer recruitment trained staff member, that we always follow up gaps in previous employment, that we always require specific references from employers for the last five years and that for all posts, paid and voluntary, the appropriate Disclosure and Barring Service certificate. In line with recruitment guidance we:

- keep a central record of all staff with the date and outcome of their DBS check so at all times staff and students and parents/carers can be assured this has been done;
- record the date and number of an individual's DBS certificate on the Single Central Record. For anyone who has information on their DBS certificate, a risk assessment is carried out regarding that information and actions taken accordingly.
- require two and sometimes three references. Employers within the past five years, who are not given as referees are contacted separately.
- ask for an overseas Police Check for anyone who has lived/ worked abroad for more than three months within the last five years.

- 9.4 The full guidance for the Trust Safer Recruitment Process can be found in Appendix C.
- 9.5 At some point in the recruitment process staff are expected to disclose any relationships and/or associations they may have with a student either in person or online.

10. Contractors and Outside Services

- 10.1 All contractors providing services within the School whose staff has access to school premises are expected to comply with this policy and the attached procedure.
- 10.2 Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.
- 10.3 When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- 10.4 In the case of Nonsuch High School for Girls, parts of the School's facilities are leased separately to a leisure group and a nursery. David Lloyd Leisure controls the occupation and use of the leisure complex. The Treetops Nursery controls the occupation and use of the nursery. There is provision within the leases for routine management meetings between the School and the controlling bodies enabling parties to liaise with the School on safeguarding children and child protection, where needed.
- 10.5 Where services or activities are provided separately by a third party, the Trust is responsible for seeking assurance that the organisation or business concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection including hirers onsite - see KCSIE.

11. Home Visits

- Home visits should always be discussed with a member of SLT and always be carried out in the best interests of the child.

- Staff should attend home visits in pairs for their own security. A contact number must be left with the school office.
- They must sign out and inform the office of where they are going and at which time.
- Visits should not be unannounced, however there may be certain situations, such as poor attendance, where an unannounced visit is required.
- The home visit should only go ahead if the parent/carer is present.
- A brief risk assessment should be carried out before the first home visit takes place and referred to for subsequent visits.
- Members of staff should introduce themselves and the purpose of the visit should be explained.
- One adult should lead the visit to avoid the parent/carer feeling overwhelmed.
- Notes should be taken to inform future planning for the family.
- Staff should constantly read the mood of the visit to ensure that they do not put themselves in danger, including animals.
- Confidentiality should be respected at all times, unless there is a CP concern.
- All notes should be written up and shared appropriately.

In Case of Emergencies

- The school office should be aware of who is making a home visit and to which family
- If the member of staff does not return at the agreed time, then the school office will ring the contact number

The Police must be called if there is no answer or a call is received from the staff on the visit and there is reasonable cause for concern.

12. Internet Filtering and Monitoring

- 12.1 Each school will have in place a filtering system that records internet activity and can produce a report that analyses anyone trying to access blocked sites or carrying out suspicious searches.
- 12.2 In the first instance this is viewed by the DSL or Deputies in each school.
- 12.3 They then determines whether an investigation needs to take place. If a safeguarding concern is raised then the child protection procedures in this policy will be followed.

Contact Details for People with Responsibility for Child Protection

	NHSG	WHSG	CHSG
Designated Safeguarding Lead (DSL):	Mrs Nicky Holmes holmes-n@nonsuchschool.org	Mrs Michelle German mgerman@wallingtongirls.org.uk	Miss Helen Holmes hholmes@carshaltongirls.org.uk
Deputy DSLs:	Miss Hannah Johns johns-h@nonsuchschool.org Mrs Nicola Bond bond-n@nonsuchschool.org Mrs Alexis Williamson-Jones Williamson-jones-a@nonsuchschool.org Ms Amy Cavilla cavilla-a@nonsuchschool.org	Mrs Hailey Antonio hantonio@wallingtongirls.org.uk Mrs Hayley Emkes hemkes@wallingtongirls.org.uk	Mrs Stacey Warren swarren@carshaltongirls.org.uk Mrs Wendy Newman wnewman@carshaltongirls.org.uk
Safeguarding Governor:	Mrs Andrea Cooke cooke-a@nonsuchschool.org	Mrs Rosemary Allotey rallotey@wallingtongirls.org.uk	Fiona Johnston fjohnston@carshaltongirls.org.uk
GLT Trustee:	Mr Alex Clark aclark@girlslearningtrust.org		
Local Authority (referrals should be to the child's local authority)	Multi Agency Safeguarding Hub (CFCS)	CFCS – 020 8 770 6001 childrensfirstcontactservice@sutton.gov.uk	

Please note that the information below is subject to change. The DSL in each school will have access to the latest version

CHILD PROTECTION PROCEDURE: GUIDANCE FOR STAFF

If concern arises about the welfare of a student the following procedure must be followed.

DO NOT DELAY

1. Tell the Designated Safeguarding Lead (DSL) or DDSL as soon as you can in person - it may be necessary to interrupt a lesson to do this - do not leave this until end of the day once the child has gone home.
2. Early referral gives more time to offer help to the student and family before the situation becomes severe or serious; when the matter is already severe or serious, early referral gives more time for others to protect the student;
3. The DSL may consult Social Care Services.

MAKE WRITTEN NOTES

1. At the earliest opportunity, record your concerns on CPOMS, record facts accurately in the words of the child. These notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated.
2. If you make written notes at the time of the disclosure please make sure these are signed and dated and passed to the DSL.

CONCERN FROM SOMETHING THE CHILD SAYS

Listen - do not ask questions or interrogate. Consider interpreting services if English is a second language. Consider using a signer or communication aid if student has special needs.

Remain calm - if you are shocked, upset or angry the student will sense this and this could stop them from saying more.

Reassure - the student has done nothing wrong - tell them it is alright to talk.

TED You may wish to use the acronym 'TED' as a reminder that the child can be encouraged to 'Tell', 'Explain' and 'Describe' **the concern**.

Do not promise to keep it secret - tell the student you cannot keep the matter secret and will need to take advice from someone who can help.

REFERRAL PROCESS

Usually the DSL or their deputy should make a referral to Social Care or to the Police. However, referral must not be delayed - if the DSL or deputy is not available a senior member of staff should be advised and the referral made (see London Child Protection Procedures for details). The Multi-Agency Safeguarding Hub (MASH) or the Education Safeguarding Children Adviser who will be happy to discuss concerns even if you are not sure at that stage that a referral needs to be made. Contact details for all relevant agencies are in Appendix A. If a member of staff has concerns about safeguarding practices in the school they should refer to the Whistleblowing Policy and follow its guidance. Alternatively refer to point 77 of 'Keeping Children Safe in Education' DfE September 2021.

Where a member of staff refers knows FGM has occurred, they have a duty to report the matter to the police.

REMEMBER

- 1. if in doubt, consult;**
- 2. do not ignore concerns, even if these are vague;**
- 3. your first responsibility is to the student; and**
- 4. if you need help or support to manage your own feelings, this can be provided.**

CONTACT WITH THE FAMILY

Contact with the family should be made by the DSL, their deputy or the appropriate Head of Year.

In cases where a minor physical injury causes concern, it is usual school practice to discuss this with the parent or carer. If the explanation suggests a non-accidental cause for the injury (or a failure to protect the student from harm) the student (as appropriate), parent or carer should be informed that the matter must be referred to the MASH.

In cases of possible neglect or emotional abuse, the concern may have built up over a period of time. There may have been discussion previously between school staff and the family about sources of help but if concerns persist, the DSL will need to refer to the MASH and will normally advise the family of this.

In cases of self-harm appropriate guidance, including Sutton LSCP guidance, will be followed. Responses vary from case to case and the DSL will decide on the appropriate course of action in discussion with the Head of Year and, in some cases, MASH.

In cases where there are suspicions of sexual abuse, the DSL will seek immediate advice from the MASH before discussing this with the family.

RECORDING

- all records relating to child welfare concerns will be kept on either the student's confidential file or on CPOMS. The file will be kept secure - a chronology of concern should be kept in the front of the paper records;
- where there are concerns about a student, the paper file contains a notification that there is a separate child protection file held in a secure office. Our electronic information management system has an appropriate "flag" to indicate that there are concerns about the student.
- we will keep all records of any concerns about students using the reporting form for child protection, even where there is no need to refer the matter immediately;
- information from records will only be accessed by staff on a "need to know" basis;
- Key staff will need to know when a student is subject to a Child Protection Plan, so they can monitor the student's welfare;
- records relating to the student's welfare will remain on the student's file as long as the student is a pupil at the school;
- when the student leaves the school, the new school or college will be advised in writing that our records contain information about child protection concerns even where these are no longer current. Records should be sent to the new school or FE College in a way that is lawful in terms of the requirements of the General Data Protection Act;

All files will be kept until a student is 25. Child protection files will then be destroyed along with the school file.

REFERENCED DOCUMENTS AND ABBREVIATIONS

DOCUMENTS

Children missing
education
(DfE September 2016)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Keeping children safe in
education
(DfE September 2021)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1020050/KCSIE_2021_September_guidance.pdf

London Child Protection
Procedures (5th Edition, London
Safeguarding Children Board,
March 2017)

<http://www.londoncp.co.uk/>

Safeguarding Children and Safer
Recruitment in Education (DfES,
2012)

[Safeguarding children and safer recruitment in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1020050/Safeguarding_children_and_safer_recruitment_in_education_-_GOV.UK_(www.gov.uk))

Sexting in schools and colleges:
responding to incidents and
safeguarding young people
(UKCCIS)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439_KG

The Prevent
Duty
(DfE June 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent_-_duty-departmental-advice-v6.pdf

Working together to safeguard
children (HM Government,
Sep 2018)

[Working together to safeguard children - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1020050/Working_together_to_safeguard_children_-_GOV.UK)

Female Genital Mutilation
Multi-agency statutory guidance on

female genital mutilation July 2020

<u>Multi-agency statutory guidance on female genital</u>	<u>mutilation - GOV.UK</u>
Forced Marriage	<u>Forced marriage - GOV.UK</u>
Honour-based violence	<u>Honour based violence</u>
Child Sexual Exploitation (CSE) Definition and guidance for practitioners	<u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf</u>
Review of Sexual Abuse in school	<u>https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges</u>
Sharing Nude images, how to respond.	<u>Sharing nudes and semi-nudes: how to respond to an incident (overview) - GOV.UK (www.gov.uk)</u>

ABBREVIATIONS

CAF	----	Common Assessment Framework
CJSM	----	Criminal Justice Secure Email
CP	----	Child Protection
CCE	----	Child Criminal Exploitation
CSE	----	Child Sexual Exploitation
CV	----	Curriculum Vitae
CYPLD	----	Children and Young People’s Learning Directorate
DBS	----	Disclosure and Barring Service
DfE	----	Department for Education
DOB	----	Date of Birth
DSL	----	Designated Safeguarding Lead
EEA	----	European Economic Area
FE	----	Further Education
FGM	----	Female Genital Mutilation
GLT	----	Girls’ Learning Trust
HR	----	Human Resources
ID	----	Identification
IFL	----	Institute for Learning
ISA	----	Independent Safeguarding Authority
IT	----	Information Technology
KCSIE	----	Keeping Children Safe in Education
LADO	----	Local Authority Designated Officer
LBS	----	London Borough of Sutton
LGB	----	Local Governing Body
LSCB	----	Local Safeguarding Children’s Board
MASH	----	Multi Agency Safeguarding Hub
NCTL	----	National College for Teaching and Leadership
NI	----	National Insurance
PGCE	----	Post Graduate Certificate of Education
SCR	----	Single Central Register
SIMS	----	School Information Management System
SLT	----	Senior Leadership Team

So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

FGM is considered a form of abuse in the UK and is illegal.

All staff within the Trust will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police.

Teaching staff are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.

NB. The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

There are a range of potential indicators that a student may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal FGM.

Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the following:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from school followed by withdrawal or depression
- Reluctance to undergo normal medical examinations

- Asking for help, but not being explicit about the problem due to embarrassment or fear

Staff will not examine students, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL.

Forced marriage

Forcing a person into a 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. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

Child sexual exploitation (CSE) Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information including definitions and indicators are included in Annex A.

CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

CCE does not always involve physical contact; it can also occur through the use of technology.

The Trust has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

Identifying cases

Trust staff members are aware of and look for the key indicators of CSE; these are as follows:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;

- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Some of the following can be indicators of CCE:

- association with other young people involved in exploitation;
- changes in emotional well-being;
- appearing with unexplained gifts or new possessions;
- misuse of drugs and alcohol;
- missing for periods of time or regularly come home late; and
- regularly missing school or education or do not take part in education.

Referring cases

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

Support

The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Homelessness

The DSL and deputy(s) will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”

Referrals to the Local Housing Authority **do not replace referrals to social care** where a child is being harmed or at risk of harm.

For 16- and 17-year-olds, homelessness may not be family-based and referrals to social care will be made as necessary where concerns are raised.

County lines criminal activity

For the purpose of this policy, “**County lines criminal activity**” refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a student may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.

Indicators that a student may be involved in county lines activity include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones

- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

Students with family members in prison

Students with a family member in prison will be offered pastoral support as necessary.

They will receive a copy of '[Are you a young person with a family member in prison](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Students required to give evidence in court

Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Students will also be provided with the booklet '[Going to Court and being a witness](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Contextual safeguarding

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

Safeguarding incidents can occur outside of school and can be associated with outside factors. Trust staff, particularly the DSL and deputies, will always consider the context of incidents – this is known as **contextual safeguarding**.

Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

The school will provide as much contextual information as possible when making referrals to social care.

Preventing radicalisation

For the purpose of this policy, "**radicalisation**" refers to the process by which a person comes to support terrorism and extremist ideologies.

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.

The school will actively assess the risk of students being drawn into terrorism.

Staff will be alert to changes in students' behaviour which could indicate that they may be in need of help or protection.

Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

Training

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

Risk indicators of vulnerable students

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis include the following

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances include the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

When making a judgement, staff will ask themselves the following questions:

- Does the student have access to extremist influences?
- Does the student access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the student has been, or is likely to be, involved with extremist organisations?
- Is the student known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the student sympathise with or support illegal/illicit groups?
- Does the student support groups with links to extremist activity?
- Has the student encountered peer, social, family or faith group rejection?

- Is there evidence of extremist ideological, political or religious influence on the student?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the student?
- Has there been a significant shift in the student's outward appearance that suggests a new social, political or religious influence?
- Has the student come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the student vocally support terrorist attacks, either verbally or in their written work?
- Has the student witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the student travelled for extended periods of time to international locations?
- Has the student employed any methods to disguise their identity?
- Does the student have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the student display a lack of affinity or understanding for others?
- Is the student the victim of social isolation?
- Does the student demonstrate a simplistic or flawed understanding of religion or politics?
- Is the student a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the student have insecure, conflicted or absent family relationships?
- Has the student experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?

Critical indicators include where the student is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

Channel programme

Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable student is at risk of being involved in terrorist activities.

In cases where the school believes a student is potentially at serious risk of being radicalised, the head-teacher or DSL will contact the Channel programme.

The DSL will also support any staff making referrals to the Channel programme.

The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

Extremist speakers

The Trust prevents speakers who may promote extremist views from using the school premises.

Building young people's resilience

The school will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside students' spiritual, moral, social and cultural development.
- Allow students time to explore sensitive and controversial issues.
- Provide students with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and
- recognise where pressure from others threatens their personal safety and wellbeing.
- Equip students to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach students about how democracy, government and law making/enforcement occur.
- Teach students about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

The school will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The [Educate Against Hate](#) website

A child missing from education

A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation.

Staff will monitor students that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the respective schools' Attendance and Punctuality policy.

The school will inform the LA of any student who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

Students are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the student will first be attending.

The school will notify the LA within five days of when a student's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.

Two emergency contact details will be held for each student where possible.

Staff will monitor students who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the student will live
- The new address
- The date from when the student will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the student first attended, or is due to attend, that school

Where a student moves to a new school, the school will use a secure internet system to securely transfer students' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the student continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a student from the admissions register where the school and LA has been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.

If a student is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the student
- The full name and address of any parent with whom the student lives
- At least one telephone number of the parent with whom the student lives
- The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable
- The name of the student's new school and the student's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Student Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for students back into the school.

The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.

The school will also highlight any other necessary contextual information including safeguarding concerns

Students with SEND

The school recognises that students with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of students.

Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Students with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration.

When managing a safeguarding issue relating to a student with SEND, the **DSL** will liaise with the school's **SENDCO**, as well as the student's family where appropriate, to ensure that the student's needs are effectively met.

Alternative provision

The school will remain responsible for a student's welfare during their time at an alternative provider.

When placing a student with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

Work experience

When a student is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.

Where the school has students conduct work experience at the school, an enhanced DBS check will be obtained if the student is over the age of 16.

Homestay exchange visits

School-arranged homestays in UK

Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay.

In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host.

In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

It is not possible for schools and colleges to obtain criminality information from the DBS about adults who provide homestays abroad. Schools and colleges should liaise with partner schools abroad, to establish a shared understanding of, and agreement to the arrangements in place for the visit. They should use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents should be aware of agreed arrangement. Schools and colleges are also free to decide whether they consider it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK. Students will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or student arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

Private fostering

Where the school becomes aware of a student being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment between children in schools and colleges Context Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

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

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,

- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003¹³⁵ as described below:

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

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: <https://rapecrisis.org.uk/get-informed/about-sexual-violence/sexual-consent/>

Sexual consent

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16;

- sexual intercourse without consent is rape.

Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. 139 It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young

<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-advice-for-education-settings-working-with-children-and-young-people>

Upskirting

‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Domestic abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been, married to each other or civil partners; or have

agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

A preventative approach

In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHCE lessons.

The school will also ensure that students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment

Students will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled

Awareness

All staff will be aware that students of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.

All staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.

All staff will be made aware of the heightened vulnerability of students with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student’s SEND and will always explore indicators further.

LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.

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

Students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

Support available if a child has been harmed, is in immediate danger or at risk of harm

If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to social care.

Within one working day, a social worker will respond to the referrer to explain the action that will be taken.

Support available if early help, section 17 and/or section 47 statutory assessments are appropriate

If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support available if a crime may have been committed

Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to MASH. The DSL will be aware of the local process for referrals to both MASH and the police.

Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.

Each school in the Trust has a close relationship with the local police force and the DSL will liaise closely with the local police presence.

Support available if reports include online behaviour

Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.

If the incident involves sexual images or videos held online, the [Internet Watch Foundation](#) will be consulted to have the material removed.

Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Managing disclosures

Victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed.

If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of CSCS where necessary. If staff are in any doubt, they will speak to the DSL.

Where an alleged incident took place away from the school or online but involved students from the school, the school's duty to safeguard students remains the same.

All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the child chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the child with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
- Only recording the facts as the child presents them – not the opinions of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice and [UK Council for Child Internet Safety \(UKCCIS\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/organisations/uk-council-for-child-internet-safety)
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.

The DSL will be informed of any allegations of abuse against students with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the student in mind at all times.

Confidentiality

The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk.
- If a child is at risk of harm, is in immediate danger or has been harmed, a referral will be made.
- Rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved.

When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

Risk assessment

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

Risk assessments will consider:

- The victim.
- The alleged perpetrator.
- Other children at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the Trust's GDPR policy.

The DSL or a deputy will decide the school's initial response, taking into consideration:

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.
- Any power imbalance between the children.
- Whether the incident is a one-off or part of a pattern.
- Any ongoing risks.
- Any related issues and the wider context, such as whether there are wider environmental factors in a child's life that threaten their safety and/or welfare.
- The best interests of the child.
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other children involved.

For reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately.

In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Managing the report

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to CSCS or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing early help
- Referring to CSCS
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically.

The following situations are statutorily clear and do not allow for contrary decisions:

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.

- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Managing internally

In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

Providing early help

The school may decide that statutory interventions are not required, but that students may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Referral to Social Care

If a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to MASH. Parents will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with MASH.

The school will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with MASH to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions.

If MASH decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the child to be in immediate danger or at risk of harm.

If the school agrees with the decision made by MASH, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Reporting to the police

Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to MASH. The DSL and deputies will follow the local process for referral.

Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with MASH and any appropriate specialist agencies.

The DSL and governing body will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.

The DSL will be aware of local arrangements and specialist units that investigate child abuse.

In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Bail conditions

Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.

The school will work with MASH and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.

The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.

Where bail is deemed necessary, the school will work with MASH and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.

Managing delays in the criminal justice system

The school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.

The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.

The school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support.

The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

- Ongoing support for the victim

Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the school uses to describe the victim
- The age and developmental stage of the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like

Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

The school will provide a physical space for victims to withdraw to.

Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.

Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.

If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

- Ongoing support for the alleged perpetrator

When considering the support required for an alleged perpetrator, the school will take into account:

- The terminology they use to describe the alleged perpetrator or perpetrator.
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.

When making a decision, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.

If the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

The school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the student understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.

The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.

The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time.

The school will be clear whether action taken is disciplinary, supportive or both.

Shared classes

Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the student will always come first.

Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other students.

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and

perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding other children

Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

It is likely that children will "take sides" following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

Online safety

As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online (including when they are at home).

Through training, all staff members will be made aware of the following:

- Student attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a student's online activity

The school will ensure that suitable filtering systems are in place to prevent children accessing terrorist and extremist material.

The use of mobile phones by staff and students is closely monitored by the school. The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what students can be taught regarding online teaching.

Mobile phone and camera safety

All members of the school community will adhere to the terms of the respective schools' E-Safety Policy at all times. Photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the Trusts GDPR policy

The Trust will adhere to its Photograph and Media policy at all times.

Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy.

Sports clubs and extracurricular activities

Clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard students and adhere to local safeguarding arrangements.

Paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of students.

Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary. All national governing bodies of sport that receive funding from either Sport England or UK Sport, must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

Safer recruitment

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

Pre-employment checks

The governing board will assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the [TRA Teacher Services' System](#).
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the [Gov.UK](#) website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.
- Checking professional experience, QTS and qualifications as appropriate using Teacher Services.

- **Academies, free schools and independent schools only** confirming that an individual taking up a management position is not subject to a section 128 direction.

An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

Internal candidates

- If an individual moves from a position within the Trust that did not involve the provision of education to one that does, it will be treated as if the individual were a new member of staff and all required pre-appointment checks will be carried out.
- References from internal candidates will always be scrutinised before appointment.

ITT candidates

Where applicants for ITT are salaried by the school, the school will ensure that enhanced DBS checks with barred list information are carried out.

Written confirmation will be obtained to ensure that an enhanced DBS certificate and barred list check has been carried out for all fee-funded trainees.

Governors

An enhanced DBS check will be carried out for each member of the governing board in a maintained school. Where a governor also engages in regulated activity, a barred list check will also be requested. The school will also contact the TRA using Teacher Services to check if a proposed governor is barred as a result of being subject to a section 128 direction. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check.

The trust requires **enhanced DBS checks on all members of the academy trust**, individual charity trustees, and the chair of the board of charity trustees. Before an individual becomes a trustee, the school will carry out an enhanced DBS check and confirm their identity. Where a trustee also engages in regulated activity, a barred list check will also be requested. An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check. If the individual lives or has lived outside of the UK, consideration will be given as to further checks that may be necessary.

Those who have lived or worked outside of the UK

For those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

Barred list check

An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.

If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.

Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

References will only be accepted from a **senior person** and not from a colleague.

References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

References will be obtained prior to interviews taking place and discussed during interviews.

Open testimonials will not be considered.

Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

Information sourced directly from a candidate or online source **will be carefully vetted** to ensure they originate from a credible source.

Volunteers

No volunteer will be left unsupervised with a student or allowed to work in regulated activity until the necessary checks have been obtained.

An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.

Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.

A supervised volunteer who regularly teaches or looks after children **is not** in regulated activity.

The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.

Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

Contractors

The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

Data retention

DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.

A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity.

Mental Health

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

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

Where children have suffered abuse and neglect, or 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 their 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. Its resources include social media, forming positive relationships, smoking and alcohol.

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

<https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview>

Peer-on-Peer Harms

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Peer on peer abuse is most likely to include, but may not be limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers;

- 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 nude 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, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear about their School's policy and procedures with regard to peer on peer abuse, in particular:

- procedures to minimise the risk of peer on peer abuse;
- how allegations of peer on peer abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other child affected by peer on peer abuse will be supported;



Safeguarding Flowchart

Student shows signs of or discloses abuse or sexual exploitation

If a student discloses to you

- Do not lead the student or ask questions
- Remain calm, listen carefully, take detailed notes if you are able to, include time and date.
- Notes should be passed to the DSL signed and dated.
- **DO NOT PROMISE TO KEEP A SECRET**, but do advise the student that you will need to pass information to a member of the safeguarding team

If you have a suspicion or another student has hinted there is a concern

Visit or Phone a member of the safeguarding team, if you are unable to leave a classroom send a student with a sealed note requesting a member of the safeguarding team come to you. **Do not just send an email and assume it will be seen. Record on CPOMS as soon as possible.**

If you are unable to locate a member of the Safeguarding Team talk to any member of SLT. If no one is available please call MASH for further guidance.

If it will not cause further harm to the student a member of the safeguarding team will contact parents.

Referral to MASH made by a member of the Safeguarding Team

020 8770 6001 (Sutton)
020 8726 6464 (Croydon)
020 8545 4226 (Merton)

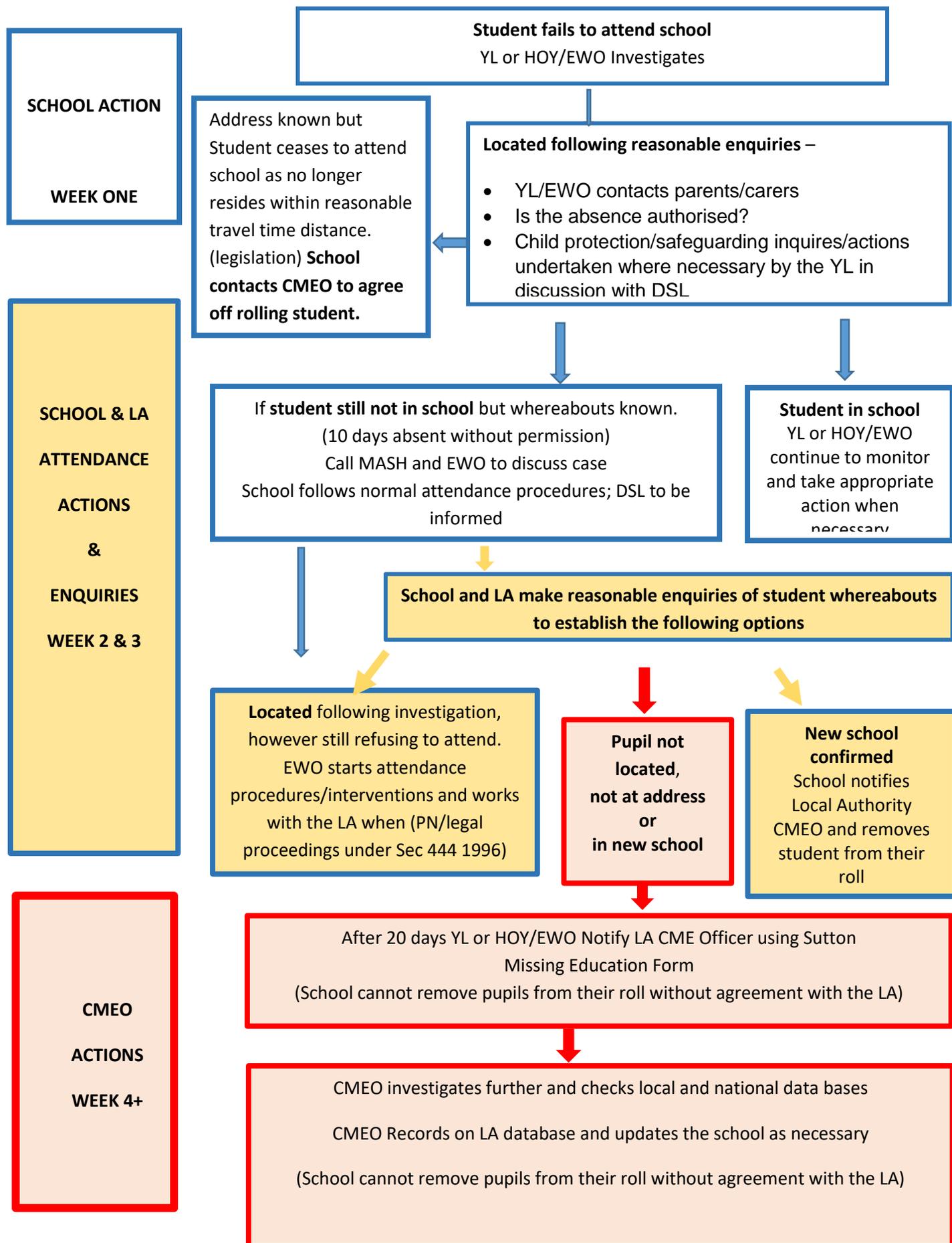
A member of the Safeguarding Team may

Contact Police

The Safeguarding team may ask students or staff to write statements if relevant

Check details on CPOMS are completed with as much detail as possible including dates and times.

Children Missing Education referral pathways



Managing Self-harm Flowchart

