



PLATANOS COLLEGE

An outstanding school for
pupils of all abilities

SAFEGUARDING AND CHILD PROTECTION POLICY

Statement of Intent

We are committed to providing a caring, friendly and safe environment for all of our pupils so that they can learn in a relaxed and secure atmosphere. We believe every pupil should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm.

This is the responsibility of every adult employed by, or invited to deliver services at, Platanos College. We recognise our responsibility to safeguard and promote the welfare of all our pupils by protecting them from physical, sexual or emotional abuse, neglect and bullying.

2026 – 2027

Safeguarding and Child Protection Policy

Review procedures

This Policy is to be reviewed annually or as necessary with notification being given to the Board of Trustees on the results of any review.

If any amendments to the Policy are required as a result of a review, then these will be presented to the Board of Trustees for consideration and acceptance of the amendments.

Date reviewed:	28 August 2026
Date of next review:	27 August 2027

Contents

i	Key contacts
ii	Update to the ‘Keeping Children Safe in Education’ guidance
Part 1: Safeguarding principles and information	
1	Introduction to safeguarding and child protection
2	General principles and aims of safeguarding and child protection
3	The legal framework and guidance
4	Safeguarding and promoting the welfare of children: information and definitions for all staff
Part 2: The management of safeguarding	
5	The management of safeguarding: A safer culture and good management practice
6	Roles and responsibilities
Part 3: Child protection procedures	
7	Processes for safeguarding young people
8	Child protection procedures and action
9	Disclosure
10	Response following report/disclosure
11	Safeguarding referral
12	Concerns, complaints or allegations against staff
Part 4: Appendices	
1	Assessment framework triangle
2	Responding to concerns about a child
3	What happens next?
4	Body map templates
5	Covid-19 Addendum

Safeguarding and Child Protection Policy

i. KEY CONTACTS

Designated Safeguarding (and Looked After Children) Lead (DSL) at Platanos College:

Ms T. Williams (Senior DSL)

T: 020 7733 6156; Email: safeguarding@platanoscollege.com

Deputy Designated Safeguarding Lead at Platanos College:

(There are several deputies at the college)

Mr D. Schardsmith

Mr R. Edwards

Ms C. Scully

Mr R. Beaton

Mr M. Augustus

Ms A. Henry

T: 020 7733 6156; Email: safeguarding@platanoscollege.com

Designated Trustee for Safeguarding:

Mr H. Whyte (Platanos Trust, Clapham Road, London, SW9 0AL)

Local Authority contacts:

Lambeth Children's Services first response / integrated referral hub: 020 7926 3100

Lambeth referral hub out of hours: 020 7926 1000

Local Authority Designated Officer (LADO):

T: 020 7926 4579 / 07720 828700; Email: lado@lambeth.gcsx.gov.uk

Local Authority Safeguarding Manager:

Sarwan Singh Jandu; T: 020 7926 9643; M: 07976 490051; Email: sjandu@lambeth.gov.uk

Denys Rasmussen; T: 020 7926 8915; Email: drasmussen@lambeth.gov.uk

ii. UPDATE TO THE ‘KEEPING CHILDREN SAFE IN EDUCATION’ GUIDANCE SEPTEMBER 2026

This policy takes into consideration and incorporates the latest guidance and changes to the ‘Keeping Children Safe in Education’ (KCSIE) 2026 document.

The key changes to the KCSIE are summarised below and staff are instructed to ensure that they are familiar with the updates.

Throughout the guidance

1. Updated terminology to include “*universal services and community-based early help*” and “*the targeted early help level of Family Help*.”
2. Updated the definition of “*assault by penetration*”.
3. Updated the definition of “*sexual abuse*” to mirror the definition used in ‘Working Together to Safeguard Children’.
4. Updated the definition of “*sexual assault*”.

Safeguarding information for all staff

5. Updated to distinguish between community-based early help and targeted early help delivered through “Family Help”.
6. Expanded examples of issues staff should remain alert to.
 - a. Added “*modern slavery*”.
 - b. Added “*including physical, sexual, and emotional abuse, stalking*” and “*financial exploitation*”.
 - c. Added additional sentence about child to parent or care giver abuse.
 - d. Clarified that emotional abuse may include verbal abuse (e.g., criticism, belittling, name-calling).
7. Expanded section on sexual abuse to provide clear examples of physical contact.
8. Clarified that safeguarding issues often overlap.
9. Expanded child-on-child abuse content to emphasise that: it is a safeguarding issue for both victim and alleged perpetrator, it is preventable and it may involve serious physical harm or threats involving weapons.
10. Expanded Child Criminal Exploitation and Child Sexual Exploitation content: “*This can be committed or facilitated by an organised network or gang, and victims may identify as part of this group.*”, “*This may constitute modern slavery...*” and a reference to Modern Slavery statutory guidance, including referral expectations. Added a new footnote defining county lines and linking to Home Office guidance.

Added “This can be committed by an individual or an organised network...” and “Most sexual abuse is committed by individuals known to the victim.” Added clarification that victims may be criminalised for actions taken under coercion. Added a footnote defining “*organised network*” (from the Independent Inquiry into Child Sexual Abuse).

11. Mental Health section: substantially updated.
12. **Serious Violence section: substantially updated as a safeguarding concern.** Including guidance around the school's role in protecting children from violence, sharing information early and supporting those at risk (paragraphs 49 to 52).
13. Added additional information about managing any support for the child internally.
14. Clarified when non-social-worker practitioners may lead assessments.
15. Added expectations regarding local assessment protocols.
16. Added references to “*trainee teachers*”.
17. Added requirement to consider referral to the LADO.
18. Updated flowchart correcting “Early Help to “Family Help”, and improving accessibility.

The management of safeguarding

19. Added new sections and requirements on “**Sport**” and “**Regulations and safeguarding requirements relating to school premises**”.

The school must not allow children into toilets, changing rooms or showers designated for the opposite biological sex, and a new section covers single-sex sports exceptions based on biological sex (paragraphs 97-100 and 107-118).

20. Added expectations for robust DSL cover arrangements (e.g., confidential shared mailbox).
21. Expanded guidance on information sharing, including risk assessment and the legal duty to share safeguarding information.
22. Added “*racism*” and “*derogatory behaviour or other forms of physical violence and conflict*”.
23. Minor revised content on racism, and other prejudice-based behaviour to mirror expectation in ‘*Working Together to Safeguard Children*’.
24. Added details on PSHE Association approved resources.
25. Updated definitions of online risk categories.
26. **Added guidance and resources on safe and effective use of Generative AI in education.** Including new links to resources to support your school in making decisions around the use of generative AI (paragraph 165).
27. Added new section on “*Mobile phone policy*”. Implement a policy where pupils don’t have access to their phones at all during the school day (paragraph 168).
28. **Filtering and monitoring.** Updated wording “...ensure that a review of their effectiveness is carried out at least once every academic year. Reviews should be carried out by the SLT member

responsible for filtering and monitoring, with the support of the school's DSL and IT support. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks...". Accounting for generative AI.

29. Redrafted to improve clarity on information security.
30. Updated the list of factors that a school's child protection policy should consider in relation to child-on-child abuse – including procedures for the way the school handles both consensual and non-consensual making and sharing of nudes and semi-nudes, including those generated using AI (paragraph 193).
31. Added reference to "misandry".
32. Added new section on "Boarding and residential accommodation".
33. Updated section on reasonable force to reflect new restrictive intervention guidance.
34. Updated content relating to alternative provision.
35. Updated section on "Children requiring mental health support".
36. Highlighted the role of Virtual School Heads in improving attendance.
37. Added new section on "Young carers" and their specific needs.
38. Added further additional barriers that children with SEND may face.
39. Added new section on safeguarding children with medical conditions.
40. **Updated content on children who are LGB or gender-questioning.** The school is expected to take a 'very careful' approach when responding to requests related to social transition (paragraphs 253 to 284).

Safer recruitment

41. Regulated activity section rewritten for clarity and to include volunteers. Regulated activity table updated to remove the 'supervision exemption' from regulated activity. This change has been made by the Crime and Policing Act 2026. Removed "DBS check types" section to avoid duplication.
42. Minor change to Regulated activity section to make clearer that where schools are also subject to the EYFS framework, staff or volunteers must not be permitted to begin working within the setting covered by the EYFS framework until the school has received the enhanced DBS certificate, including barred list information.
43. Added new bullet point on **DBS checks for volunteers in regulated activity**.
44. Updated references from TRA Employer Access Service to DfE's Check a teacher's record.
45. Added "*or within 30 calendar days of the issue date on the certificate*".
46. Removed the DBS Criminal Record Checks and Barred List Checks flowchart as it was no longer factually accurate following the removal of 'supervision exemption' from regulated activity under the Crime and Policing Act 2026.

47. Clarifies the type of DBS check a self-employed person is now eligible for.
48. Clarified categories of visitors to schools.
49. ‘Volunteer Section’ rewritten to remove the ‘supervision exemption’ from regulated activity. This change has been made by the Crime and Policing Act 2026.
50. Work experience supervision section rewritten for clarity and in response to the Crime and Policing Act 2026 change to the definition of regulated activity.
51. ‘Duty to refer section’ rewritten to include referrals about volunteers.
52. Added reference to schools’ duties under the PSED (public sector equality duty).

Safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors

53. Reference to “*Trainee teachers*” added throughout.
54. Updated supply teachers, trainee teachers and all contracted staff section to make it clearer that schools and colleges share safeguarding responsibilities with third party organisations.
55. New content setting expectations for handling concerns about trainee teachers.

Child-on-child sexual harassment and sexual violence

56. Substantially rewritten to highlight **the progressive continuum from harmful sexual behaviour (HSB) escalating through to sexual harassment or sexual violence**.
57. Updated to clarify that all incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether they are consensual or non-consensual.
58. Additional paragraph added on HSB (harmful sexual behaviour).
59. Added link to NSPCC resource providing advice on stages of typical sexual development and behaviour for different age groups.
60. Added link to resource for advice on responding to children who display sexualised behaviour.
61. Added further information on consent.
62. Updated header and expanded description of universal services and community-based early help.
63. Added new section on “***Referrals to Family Help***”.

Annex A – Further information

64. Cybercrime section expanded with detail on CMA offences and national risks.
65. Domestic Violence content updated.
66. Operation Encompass content updated.

- 67. Online safety (parental support) now includes link to screentime guidance.
- 68. Additional section added on “Temporary accommodation notification duty”, including updated link.
- 69. Additional info added to paragraph on Channel to include clarification that information should be shared with the police.
- 70. Serious violence content update.
- 71. Links added to examples of support for DSLs.
- 72. Link to Home Office child knife possession guidance included.

Annex B – Role of the Designated Safeguarding Lead

- 73. Added expectations around DSL cover arrangements when the DSL is unavailable.
- 74. Added further information to information sharing guidance.
- 75. Updates on CCE/CSE indicators and Operation Encompass duties.

Annex C – Regulated activity (children) supervision of activity which is regulated activity when unsupervised

- 76. Removed Crime and Policing Bill Act 2026. Made changes to regulated activity to remove the ‘supervision exemption’.

Enhanced DBS and Barred List checks for volunteers. This means that any person volunteering in a school or college in a role that involves teaching, training, instructing or supervising children on more than 3 days in a month or overnight is now in regulated activity and will therefore need an enhanced DBS check with barred list information (paragraph 381).

PART 1: SAFEGUARDING PRINCIPLES AND INFORMATION

1. INTRODUCTION TO SAFEGUARDING AND CHILD PROTECTION

What is Safeguarding?

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing the 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.
- Taking action to enable all children to have the best outcomes.

What is Child Protection?

Child Protection forms part of the broader safeguarding and promotion of children's welfare. Child Protection is the process and procedure of protecting individuals identified as either likely to suffer, or suffering, from significant harm as a result of abuse or neglect. This will be outlined further in this document.

Child in Need

A 'child in need' is defined under the Children Act 1989 (Section 17) as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services, or if the child is disabled.

Significant Harm

Significant harm can be defined as the ill-treatment or impairment of the health and development of a child or young person. Development includes physical, intellectual, emotional, social or behavioural development. Health includes physical and mental health. This is viewed from the perspective of normal behaviour for a child of a similar age and understanding.

2. GENERAL PRINCIPLES AND AIMS OF SAFEGUARDING AND CHILD PROTECTION

- We are committed to providing a safe and secure environment for pupils, staff and visitors and to promoting a climate where children and adults will feel confident about sharing any concerns that they may have about their own safety or the well-being of others. This Policy is one element in our whole school arrangements to safeguard and promote the welfare of children and young people to

ensure they are protected from harm. This Policy should be read in conjunction with other policies which cover other areas of safeguarding and health and safety practice.

- All children and young people have a right to protection from abuse, violence and exploitation. Every concern, suspicion or complaint of abuse or significant harm from within or outside the school will be handled and taken seriously in all proper circumstances and referred to an external agency.
- Children and young people need protection and safeguarding for many reasons. There are a number of areas that need to be recognised, for example: physical, sexual and emotional abuse, poverty, disadvantage, exclusion and violence. Young people may be at risk from their peers as well as adults.
- Staff working in schools have a statutory duty to safeguard and promote the welfare of children under the Children Act 2004 and in turn feel safe themselves from false accusation.
- The establishment should have a written policy on safeguarding/child protection that is implemented in conjunction with staff and is accompanied by full training. All staff should read the policy.
- The establishment should keep good records and be abreast of national guidance, including that of the Local Safeguarding Partners and current DfE and Ofsted guidance.
- The school aims to protect and promote the welfare of all its pupils regardless of their background and is partly based on the *Every Child Matters* initiative (with five outcomes). ***Although this was a past government initiative, the school believes that the principles themselves promote good practice.***
- The school will support each pupil as far as possible with the aim of achieving the following five outcomes for its pupils:
 - Stay safe – protected from maltreatment, neglect, violence and sexual exploitation. To have security, stability and to be cared for.
 - Healthy – be physically, mentally, emotionally and sexually healthy.
 - Achieve and enjoy – personal and social development and enjoy recreation.
 - Positive contribution – make a positive contribution including developing positive relationships, self-confidence and successfully dealing with significant life changes.
 - Economic well-being.
- The school will identify a Designated Safeguarding Lead (DSL) and, as good practice, will have a deputy (or deputies) as well.

3. THE LEGAL FRAMEWORK AND GUIDANCE

There is no single piece of legislation or guidance that covers Safeguarding and Child Protection. This Policy relies on relevant legislation, a range of statutory and non-statutory guidance, as well as local and national frameworks, of which some of the key ones are listed below:

- The statutory responsibilities for safeguarding and child protection only apply in relation to pupils who are under the age of 18.
- The national child protection system was first based on the Children Act 1989. Crucially this determined that the child's welfare is paramount. It also introduced the concept of parental responsibility which sets out the rights, duties, powers and responsibilities of the parent or carer of a child.
- The Children Act 1989 (amended 2004) sets out in detail what local authorities and the courts should do to protect the welfare of children.
- The role of the three Local Safeguarding Partners (the local authority, the clinical commissioning group and the chief officer of the police).
- DfE guidance 'Keeping Children Safe in Education'.
- 'Working Together to Safeguard Children: A Guide to Inter-agency Working to Safeguard and Promote the Welfare of Children' (DfE) provides guidance on how professionals can work together.
- DfE guidance 'Teaching online safety in school'.
- DfE guidance 'Sexual violence and sexual harassment between children in schools and colleges'.
- Non-statutory guidance from the Safer Recruitment Consortium: 'Guidance for safer working practice for those working with children and young people in education settings'.
- One of the recommendations of Lord Laming's report of the Victoria Climbié inquiry was for a simple guide to be compiled, outlining the child protection processes and systems for anyone working with children.
- The school must operate safe recruitment procedures, making sure that all appropriate checks are carried out (refer to the separate **Safer Recruitment Policy**).
- The Ofsted publications on safeguarding best practice and the inspection framework provide excellent guidance to schools in the development of good practice. Safeguarding practices and procedures are therefore also based on the Ofsted criteria and framework.
- Home Office guidance '*Preventing youth violence and gang involvement*' and '*Criminal exploitation of children and vulnerable adults: county lines*'.
- DfE guidance 'Mental health and behaviour in schools'.
- This Policy also draws upon other previous guidance contained in the 'London Child Protection Procedures' and previous DfE guidance documents: 'Safeguarding Children and Safer Recruitment in Education'.

4. SAFEGUARDING AND PROMOTING THE WELFARE OF CHILDREN: INFORMATION AND DEFINITIONS FOR ALL STAFF

4.1 Understanding safeguarding

All staff should understand current safeguarding and child protection policies and guidance, and should have an awareness of safeguarding issues that can put children at risk of harm. **Safeguarding is the responsibility of all staff.**

The range of areas of general safeguarding in everyday school life

- Health and safety (please refer to the Health and Safety Policy)
- School security
- First aid provision (please refer to the First Aid Policy)
- Use of physical intervention (reasonable force; see separate policy)
- Meeting the needs of pupils with medical conditions (refer to Policy Statement for Pupils with Medical Needs)
- Special educational needs and disability (SEND; see separate policy)
- Educational visits (refer to the Educational Visits Policy)
- Intimate care (see separate policy)
- Visitors (see separate policy)
- Local issues
- Safe recruitment and vetting (see Safer Recruitment Policy)

4.2 Abuse, neglect and exploitation

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

All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff, but especially the Designated Safeguarding Lead (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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse – including physical, sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation, serious youth violence, county lines and radicalisation).

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline.

Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

4.3 Signs of abuse

Possible signs of abuse include (but are not limited to):

- The pupil says he/she has been abused or asks a question which gives rise to that inference.
- No reasonable explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries.
- A sudden change in the pupil's behaviour; the pupil's behaviour is either being extreme model behaviour or extremely challenging behaviour.
- The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons.
- The pupil's development is delayed.
- The pupil appears neglected, e.g. dirty or hungry.
- The pupil is reluctant to go home or has been openly rejected by his/her parents or carers.

4.4 Types of abuse

Abuse. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Abuse can be:

1. Physical abuse – for example punching.
2. Emotional abuse – for example rejection and denial of affection.
3. Sexual abuse – for example sexual assault or forcing or enticing a child to take part in sexual activities.
4. Neglect – for example persistent failure to provide appropriate care including medical attention or persistent failure to meet a child's basic physical or psychological needs.

The school recognises that child abuse can occur in a more complex form, such as abuse through social networking websites and female genital mutilation (FGM). For these reasons, such topics of safeguarding and child protection are regularly raised throughout the school during staff/pupil training and school assemblies.

4.4.1 Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Examples of physical abuse (not an exhaustive list):

- Actual or likely physical injury to a young person or failure to prevent physical injury or suffering.
- Physical harm may also be caused when a parent or carer fabricates the symptoms of (Fabricated Induced Illness [FII]), or deliberately induces, illness in a child.
- Female genital mutilation.

4.4.2 Emotional abuse

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

Emotional abuse is a '*pattern of a relationship*' rather than an incident of abuse. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. This can occur through various mediums including online social media networks.

4.4.3 Sexual abuse

This involves forcing, causing or inciting a child 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, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse 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 as well as offline, 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. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

4.4.4 Neglect

This is the persistent failure to meet a child's basic physical and/or psychological needs, or a failure to protect the child from exposure to any kind of danger (including cold and starvation), that is likely to result in the serious impairment of the child's health or development.

Examples of neglect (not an exhaustive list):

- Extreme failure to carry out important aspects of care, resulting in the significant impairment of the child's health or development, including non-organic failure to thrive (stunted growth and development with no known medical condition).
- This can also occur in pregnancy as a result of maternal substance abuse.
- Failure to provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Failure to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

4.5 Specific safeguarding issues

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below).

The following behaviours and indicators can be signs that children are at risk:

- Drug taking and/or alcohol misuse.
- Unexplained and/or persistent absences from education.
- Serious violence, criminal exploitation (including that linked to county lines), radicalisation.
- Consensual and non-consensual making or sharing of nudes or semi-nudes.

The below are other examples of safeguarding issues all staff should be aware of (not an exhaustive list):

- Internet safety / online abuse (e-safety; see separate policy)
- Bullying (including prejudice-based and cyberbullying; see separate policy)
- Racist abuse
- Faith abuse
- Disability abuse/special needs
- Child-on-child abuse (including sexual violence and sexual harassment)
- Homophobic or transphobic abuse
- Harassment and discrimination
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE) and county lines
- Trafficking
- Fabricated or induced illness (FII)
- Domestic violence (DV) and abuse

- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Forced marriage
- Female genital mutilation (FGM)
- Mental health
- Extremism and radicalisation (see separate policy)
- Private fostering
- Sexting – including sharing of nude or semi-nude images (or youth produced sexual imagery)
- Teenage relationship abuse
- Children missing from education
- Looked after children
- Homelessness
- Honour-based violence
- Children with family members in prison

Any concerns of abuse related to the above should be dealt with and reported in line with the child protection procedures.

4.6 Further definitions and information: Online Safety (E-Safety)

The use of technology and social media has become a significant component of safeguarding children. Child sexual exploitation, radicalisation, sexual grooming - technology often provides the platform that facilitates harm.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. As such the school will ensure appropriate filters and appropriate monitoring systems are in place. The approach to online safety is to protect and educate the whole school community in their use of technology and establish mechanisms to identify, intervene and escalate any incident where appropriate.

Pupils will be taught to recognise risk and build resilience in order to manage risk themselves where appropriate to their age. Pupils will be encouraged to use the internal systems, for example the pastoral manager, learning mentor, trusted staff, to whistle blow or raise issue of safety in confidence.

4.7 Further definitions and information: Child-on-child abuse (including harassment and violence)

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school and online. **All** staff should be clear as to the school's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

All staff should understand that even if there are no reports in the school, it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have **any** concerns regarding child-on-child abuse (whether these concerns are thought to have taken place on or off-site) they should speak to the designated safeguarding lead (or a deputy). As part of this,

the school will be alert to when children might be at highest risk around the school day (for example immediately after school).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviour, misogyny, 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.

All staff should be aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

As well as knowing how to respond to concerns, **all** staff should know that child-on-child abuse is preventable. As well as knowing how to recognise behaviours and indicators of risk early, staff should know that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents,
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’),
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse),
- physical assault and harm, or the threat of harm with a weapon,
- 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),
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry, sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse,
- consensual and non-consensual making or sharing of nudes and semi-nudes (***both of which are considered a safeguarding and child protection concern requiring a response by the school, and for both the victim and those making or sharing of such images***),
- 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,
- 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 maintain an attitude of “*it could happen here*”.

All concerns or instances related to child-on-child abuse must be reported to the Designated Safeguarding Lead (DSL). Allegations of child-on-child abuse will be investigated, dealt with by the DSL, treated as a safeguarding/child protection matter as according to this policy and child protection procedures, and recorded in writing as part of the pupil’s separate child protection file.

The school has a range of measures in place to minimise the risk of child-on-child abuse:

- Clear child protection procedures are in place that inform staff of how to respond to reports of abuse.
- Anti-bullying procedures and practices are in place, that promote positive behaviour and a culture of anti-bullying and zero tolerance (for example through the Anti-Bullying Ambassadors).
- Awareness training for pupils.
- Teaching through the curriculum, assemblies and other methods.
- A range of ways of reporting abuse is available to pupils (such as through a trusted adult (pastoral or phase leader or class teacher), wellbeing or anti-bullying boxes, or a dedicated email for example). These are regularly promoted to pupils. This ensures that pupils can easily report abuse using methods that are easily to use and understand.

It must also be remembered that children who harm others are likely to have considerable needs themselves and may have witnessed violence in the family or have been exposed to physical or sexual harm, or may have committed other offences.

Support and processes are in place to support victims, perpetrators and any other children affected by such abuse. This is implemented/organised by the DSL:

- Early help referral
- Referrals made to the appropriate agencies as part of the child protection process
- Support through social services and child protection plan as appropriate
- Counselling
- Educational psychologist, assistant psychologist and other professional services and agencies
- Restorative justice (if appropriate)
- Pastoral care and support plan by the school
- Working with Children and Young People’s Independent Sexual Violence Advisors (ChISVAs)
- CAMHS

4.8 Further definitions and information: Harmful sexual behaviour (HSB), sexual harassment and sexual violence

Harmful sexual behaviour

This is problematic, abusive and violent sexual behaviour. This is developmentally inappropriate and may cause developmental damage. This is an umbrella term. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

HSB can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable.

Sexual harassment

This is unwanted conduct of a sexual nature that can occur online and offline and both inside and outside of the school. It 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. These include for example, sexual comments, sexual jokes, taunting or physical behaviour, sharing of unwanted explicit content online.

Sexual violence

It is important to be aware that child-on-child sexual violence can and does occur, both inside and outside of school/college.

Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003 as 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. (NOTE - Schools and colleges 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. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).
- **What consent is.** 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:
 - a child under the age of 13 can never consent to any sexual activity,
 - the age of consent is 16, and
 - sexual intercourse without consent is rape.

4.9 Further definitions and information: Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL (or a deputy). The DSL should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in, committing violence (who may also be victims themselves). Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. The school will also try to be alert to when children might be at highest risk around the school day (for example, immediately after school).

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support.

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

- increased absence from school,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing, or
- signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of associated risk factors which increase the likelihood of involvement in serious violence, such as:

- being male,
- having been frequently absent or permanently excluded from school,
- having experienced child maltreatment,
- having been involved in offending, such as theft or robbery.

Staff should understand the measures in place to manage these. The school will take into account the advice from the Home Office's '*Preventing youth violence and gang involvement*' and '*Criminal exploitation of children and vulnerable adults: county lines*' guidance.

4.10 Further definitions and information: Female Genital Mutilation (FGM)

FGM involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. The practice is medically unnecessary, extremely painful

and has serious health consequences, both at the time of the procedure and in later life ('Multi-Agency Practice Guidelines: Female Genital Mutilation').

Staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

The UK Government has issued guidance on FGM. It is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practised on a child it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child. Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM.

Signs that a child is at risk of FGM or that FGM has already taken place:

- The family comes from a community that is known to practice FGM
- In conversation a child may talk about FGM
- A child may express anxiety about a special ceremony
- The child may talk or have anxieties about forthcoming holidays to their country of origin
- Parent/carer requests permission for authorised absence for overseas travel or you are aware that absence is required for vaccinations
- Prolonged absence from school with noticeable behaviour change, especially after a return from holiday (which is addressed by the school's robust attendance policy and monitoring)
- Spending long periods of time away from the class during the day
- A child who has undergone FGM is a child protection issue. Consideration might then also include younger siblings for example.

Where there is a concern with FGM, a discussion or referral to our Designated Safeguarding Person should be made.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to also personally **report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

(*Warning signs that FGM may be about to take place, or may have already taken place, can be found in the publication 'Multi-Agency Practice Guidelines: Female Genital Mutilation' (p.11-12)).

4.11 Further definitions and information: Fabricated or Induced Illness (FII)

Fabricated or Induced Illness is a rare form of child abuse. It occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in the child.

FII covers a wide range of symptoms and behaviours involving parents/carers seeking healthcare for a child. This ranges from extreme neglect to induced illness.

Behaviours include the parent/carer who:

- Persuades healthcare professionals that their child is ill when they are perfectly healthy;
- Exaggerates or lies about their child's symptoms;
- Manipulates test results to suggest the presence of illness;
- Deliberately induces symptoms of illness.

The reasons for FII are unclear. It could be that the parent/carer enjoys the attention of playing the role of a 'caring' parent. Some parents/carers may have borderline personality disorders characterised by emotional instability, impulsiveness and disturbed thinking, and may have unresolved psychological and behavioural problems.

4.12 Further definitions and information: Looked After Children

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

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

We will also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

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

Virtual school heads receive pupil premium plus additional funding based on the latest published numbers of children looked after in the authority. The designated teacher for looked after children will work with the virtual school head to discuss how that funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan.

4.13 Further definitions and information: Special Educational Needs and Disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges both online and offline. The Policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;

- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEN and disabilities or certain medical conditions being disproportionately impacted by things like bullying without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges;
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Awareness of these additional barriers is reflected in the training for staff.

Any reports of abuse involving children with SEND will therefore require close liaison with the Designated Safeguarding Lead (or a deputy) and the special educational needs coordinator (SENCO) or the named person with oversight for SEND in the school.

The school will consider extra pastoral support, where appropriate, and attention for these children, along with ensuring any appropriate support for communication is in place.

4.14 Further definitions and information: Children missing from education (CME)

A child missing from education is a potential indicator of abuse or neglect. We will follow our procedures for unauthorised absence, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

It is essential that staff are alert to signs to look out for and individual triggers to be aware of, when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and forced marriage.

The school will inform their local authority of any pupil who is going to be removed from the admission register where the pupil:

- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- is in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- has been permanently excluded.

The school will inform the LA as above, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education and follow up any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect. The school will also inform the local authority of any pupil who fails to attend school regularly,

Statutory guidance on children missing from home or care is available below:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3_.pdf

Children who are absent from education

In addition, all staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods (persistent absence or unauthorised absence), as well as children missing education, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is therefore important that staff are aware of the school's unauthorised absence procedures and children missing education procedures.

4.15 Further definitions and information: Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of child abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the 'Modern Slavery' statutory guidance. In accordance with this guidance, a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.

4.15.1 Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter

cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

Sexual exploitation can take many forms ranging from the seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

A significant number of children who are victims of sexual exploitation go missing from home, care, and education at some point. Some of the following signs may be indicators of CSE and CCE:

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

This is also commonly linked with **child trafficking**. Child trafficking is the recruitment, transportation, transfer, harbouring and/or receipt of a child for the purpose of exploitation.

4.15.2 Child Criminal Exploitation (CCE) (and County Lines)

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

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

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

County lines

Child criminal exploitation is a geographically widespread form of harm that is a typical feature of **county lines criminal activity**. County lines is a term used to describe gangs and organised criminal

networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs, and a referral to the **National Referral Mechanism** should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

4.16 Further definitions and information: Domestic Violence and Abuse

Domestic violence

The definition of Domestic Violence (DV) includes any pattern of controlling or coercive or threatening behaviour (psychological, physical, sexual, financial or emotional) between those aged 16 or over who are or who have been intimate partners or family members regardless of gender or sexuality.

The definition of harm as amended in the Adoption & Children Act 2002:

Impairment suffered from seeing or hearing the ill treatment of another particularly in the home, even though they themselves have not been directly assaulted or abused.

The school recognises that DV will have an impact on aspects of a child's life. The harm suffered will vary according to the child's resilience or otherwise to his or her particular circumstances. We recognise that the victim's capacity to protect their child/ren is diminished through anxiety about their own circumstances.

We will allow an opportunity for the abused partner (predominantly the woman but not exclusively so) to disclose the harm. We will ensure that all information is dealt with securely and sensitively and refer the matter to children's social care where there is a child/ren at risk of significant harm and/or neglect.

Domestic abuse

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

4.17 Further definitions and information: 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.

If any member of staff receives a disclosure or is aware that a Forced Marriage is about to happen this must be disclosed to the Designated Safeguarding Person without delay for appropriate action to be taken. Where there is a risk that a child may be or has been taken out of the country, the school will contact the Forced Marriage Unit as well as local authority social care.

Since a change in the law in February 2023, it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This also applies to non-binding, unofficial 'marriages'.

FMU contact: 020 7008 0151, or email: fmf@fco.gov.uk.

4.18 Further definitions and information: Honour-based violence

‘Honour-based’ violence encompasses 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. All forms of so called ‘honour-based’ violence are abuse (regardless of the motivation) and will be handled and escalated as such.

4.19 Further definitions and information: Children staying with host families (homestay)

This relates to where the school makes arrangements for children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. Such arrangements could amount to “private fostering” under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both.

Where a private fostering arrangement is made by the school and the school has the power to terminate the arrangement, then it could be the regulated activity provider for the purposes of the Safeguarding Vulnerable Groups Act 2006, section 82

Where the school is the regulated activity provider, it will request a DBS enhanced check (which will include barred list information) to help determine their suitability for the arrangement. However, where the parents make the arrangements themselves, this will be a private matter between the child’s parents and the host parents and in these circumstances the school will not be the regulated activity provider.

If the school arranging for their children to stay with families overseas should be aware that the DBS cannot access criminal records held overseas. Host families in other countries, therefore, cannot be checked in the same way by local authorities as schools and colleges in this country when children stay abroad. We will work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit.

In any instance, as policy the school itself will not arrange private fostering arrangements or arrange stays with host families for its pupils.

4.20 Further definitions and information: Private Fostering

Private fostering occurs when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not the child’s parent or immediate close relative. This is a private arrangement made between a parent and the ‘carer’ for 28 days or more. **Such private fostering arrangements must be reported to the relevant local authority.**

Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity).

4.21 Further definitions and information: Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the **Local Housing Authority** so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic

abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

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

In most cases staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the Designated Safeguarding Lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

4.22 Further definitions and information: Breast Ironing

This is also known as 'breast flattening' and is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely.

4.23 Further definitions and information: Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise.

These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be

struggling with their mental health and contemplating suicide and offer support and vital early intervention. The school ensures that any interventions it offers are evidenced as safe and effective and appropriate for the need and phase of education.

The school works with external agencies to help it identify children who might require support.

If staff have a concern about a child's mental health that is also a safeguarding concern, they should follow the child protection policy and speak to the Designated Safeguarding Lead or deputy. If staff feel that a child is in immediate danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can contact the DSL (or deputy) and/or get help from NHS 111 online or call 111 and select the mental health option.

4.24 Further definitions and information: Modern Slavery

Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs. Further information and training for professionals on exploitation and modern slavery is available on the GOV.UK website ([Modern slavery training: resource page - GOV.UK](#)).

The National Referral Mechanism (NRM) is the system used within the UK to support potential victims of exploitation and modern slavery. Further information on the signs that someone may be a victim of exploitation and modern slavery, the support available to victims and how to refer them to the NRM is available in statutory guidance ([Modern slavery: how to identify and support victims - GOV.UK](#)).

Children who are referred into the NRM in England and Wales may also have access to an Independent Child Trafficking Guardian (ICTG)¹. ICTGs provide advocacy for children and help to promote and support their recovery.

Note:

Any concerns in relation to the above section must be treated as a serious safeguarding concern and must also be reported to the Designated Safeguarding Lead.

PART 2: THE MANAGEMENT OF SAFEGUARDING

5. THE MANAGEMENT OF SAFEGUARDING: A SAFER CULTURE AND GOOD MANAGEMENT PRACTICE

Staff working with children are advised to maintain an attitude of **‘it could happen here’** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff have a concern, they should follow the school’s child protection procedures (see Part 3) and speak to the DSL (or a deputy).

Options for the DSL will then include:

- managing any support for the child internally via the school or college’s own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child’s wellbeing,
- undertaking a Family Help assessment, or
- making a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children’s social care (such as a child in need or a child with a protection plan).

5.1 Prevention

- Through the creation of an open culture which respects all individual’s rights and discourages discrimination and bullying of any kind.
- Through a positive school atmosphere with teaching and pastoral support for pupils, and identifying designated child protection staff with overall responsibility for child protection.
- Through our Pastoral Team Form Tutors, offering all pupils an opportunity to talk and discuss any worries or concerns.
- Monitor children who have been identified as at risk, keeping in a secure place clear records of pupils’ progress, maintaining sound policies on confidentiality, providing information to other professionals, submitting reports to case conferences and attending case conferences.
- Work with parents to build an understanding of the school’s responsibility to ensure the welfare of all children and a recognition that this may occasionally require children to be referred to investigative agencies as a constructive and helpful measure.
- Use the curriculum to raise pupils’ awareness and build confidence so that pupils have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

- Include in the core and enhanced curriculum opportunities for PSHE and SEAL which will equip pupils with the skills they need to stay safe and develop realistic attitudes to the responsibilities of adult life.
- Make the safeguarding/child protection policy accessible to staff, parents/carers and visitors.
- **Contextual safeguarding.** All staff, particularly the Designated Safeguarding Lead and deputies, should consider the context and wider external factors impacting on children's welfare. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow for the consideration of all the available evidence and the full context of any abuse. 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 DSL (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.

5.2 Community-based Early Help and Family Help (before statutory intervention)

Any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help.

Any child may benefit from early help. Early help is the support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is also about 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. This involves the school, our DSL and local agencies working together to identify, assess the needs and provide targeted support services to the child and their family.

All staff should be particularly alert to the potential need for additional support for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan [EHCP]).
- Has a mental health need.
- Is a young carer.
- Is pregnant and/or is a parent themselves.
- Has exhibited early signs of abusive, violent and/or harmful behaviours.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care.
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- Is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised into terrorism.

- Has a parent or carer in custody, or is affected by parental offending.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse.
- Is misusing alcohol and/or other drugs themselves.
- Is at risk of so-called ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage.
- Is a privately fostered child.
- Has returned home to their family from care.
- Is persistently absent from education, including persistent absences for part of the school day.
- Is showing early signs of abuse and/or neglect.

5.3 Protection

- Ensure every member of staff know the name of the Designated Safeguarding Lead (DSL).
- To be vigilant in cases of suspected child abuse, recognising the signs and symptoms, have clear procedures whereby teachers report such cases to senior staff and are aware of local procedures so the information is effectively passed on to the relevant professionals.
- Provide and support child protection training regularly to school staff, trustees/governors and, in particular, to designated teachers to ensure that their skills and expertise are up-to-date. Targeted funding for this work is solely used for this purpose.
- Contribute to an inter-agency approach to child protection by developing effective and supportive liaison with other agencies.
- Have a clear understanding of the various types of bullying - physical, verbal and indirect, and act promptly and firmly to combat it, making sure that pupils are aware of the school's position on this issue and who they can contact for support.

5.4 Support

- Have an ethos in which children feel secure, their viewpoints are valued, they are encouraged to talk and are listened to.
- Provide suitable support and guidance so that pupils have a range of appropriate adults to whom they can turn to if they are worried or in difficulties.
- Providing support to any pupil or member of staff who may have been abused, and to parents/carers.
- Take particular care that pupils with SEN, who may be especially vulnerable to abuse, are supported effectively with particular attention paid to ensuring that those with communication difficulties are able to express themselves to a member of staff with appropriate communication skills.
- Have clear guidelines on handling allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures.
- Ensuring that when a pupil with a Child Protection Plan leaves, their file/information is transferred to the new school within the required timeframes as set out by regulations and the KCSIE, and the child’s social worker is informed.

- Staff and trustees will be supported through regular training. Staff will have opportunities to discuss their queries and concerns with the Designated Safeguarding Lead (DSL).

5.5 Teaching and training

The school recognises that safeguarding issues can occur in different complex forms and situations as mentioned above. For these reasons, comprehensive training and teaching covering all such topics/issues are provided to staff and pupils regularly and awareness is raised throughout the school through various methods.

Pupils

The governing board ensures that children are taught about how to keep themselves and others safe, including online. It is recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with SEND.

We know that schools play a crucial role in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. The programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with special educational needs and/or disabilities (SEND) and other vulnerabilities).

This programme will tackle, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships,
- healthy and respectful relationships,
- boundaries, consent and kindness in relationships,
- stereotyping, prejudice and equality,
- body confidence and self-esteem,
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour,
- the concepts of, and laws relating to all forms of sexual harassment, and abuse, and how to access support,
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

Whilst it is essential that the governing board ensures that appropriate filtering and monitoring systems are in place, they will be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Safeguarding training and teaching to raise awareness for pupils will include for example:

- Whole school awareness training/workshops for pupils annually.
- Training and raising awareness through workshops and assemblies.
- Curriculum teaching opportunities as part of a broad and balanced curriculum (e.g. online safety in PSHE (Personal, Social, Health and Economic) education, ICT and other subjects). This may also include covering relevant issues through Relationships Education and Relationships and Sex Education (formerly known as Sex and Relationships Education).

The pupil training will ensure that:

- Pupils are aware of (and confident of using) the various ways they can report their concerns or any abuse.
- Pupils have a clear understanding of safeguarding and keeping safe (including online safety).
- Pupils are well informed of the current safeguarding issues so that they are up to date (through assemblies, PSHE and other curriculum areas) and are equipped to protect their own safety and welfare.

The school recognises that a one size fits all approach may not be appropriate for all children, and take into consideration a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children.

Staff

Safeguarding training to raise awareness for staff:

- Whole school training and induction training for all staff regularly (at least annually or as necessary in response to new guidance or changes).
- Regular safeguarding updates, including the promotion, awareness and refresher training on safeguarding, including staff briefings, meetings and bulletins, for example, to include the latest guidance or changes, and local (community) safeguarding issues or information.
- Designated Safeguarding Lead training for DSL and deputies at least once every two years relevant to their role and when required in response to new guidance and legislation to reflect the changing issues.

The staff training will ensure that:

- All staff receive appropriate information on safeguarding and child protection that includes online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction.
- All staff are provided with the relevant skills and knowledge to safeguard children effectively.
- All staff are aware and alert to the current safeguarding issues and risks.
- All staff are aware of the school’s child protection procedures and identity of the DSL and deputies.

- The DSL and deputies are well equipped to address concerns and implement policies and procedures.
- The DSL and deputies to recognise the additional risks that children with SEND face (e.g. online) and able to support SEND children to stay safe.
- Timely and appropriate preventative action can take place to address concerns.
- Authorised staff are well equipped to have preventative discussions with parents/carers, where appropriate, whose children might be at risk of a child protection issue.
- All staff are familiar and able to manage any disclosures/report of abuse (including child-on-child sexual violence or harassment).
- All staff have up to date knowledge (including online safety) of safeguarding.
- Safeguarding for staff is integrated, aligned and considered as part of the school safeguarding approach and wider staff training and curriculum planning.
- In-depth to cover all areas as they arise, including for example (but not exclusive to) recognising forms of child abuse, e-safety, female genital mutilation (FGM), extremism and radicalisation, child-on-child abuse, etc.

Whilst it is essential that the school ensures that appropriate filters and monitoring systems are in place, it will be careful that “over-blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

5.6 Online safety

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

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk (4Cs):

- a) Content – being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- b) Contact – being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- c) Conduct – online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images) and including those generated using AI and online bullying.
- d) Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel a pupil/student or staff is at risk, please report it to the DSL, who will in turn report it to the Anti-Phishing Working Group (<https://apwg.org>).

We will ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Our E-Safety Policy reflects our safeguarding and child protection procedures, including consideration for remote learning tools.

Filtering and monitoring

Our online safety also includes consideration for appropriate filtering and monitoring on school devices and the school network. Pupils are not permitted to use their own personal devices (e.g. smartphone or other smart devices) whilst on the school site, and only school devices via the school network. This ensures that all pupils are appropriately protected online by our filtering and monitoring systems.

We will use our communication with parents/carers to reinforce the importance of children being safe online, help parents/carers to understand what systems we have in place to filter and monitor online use, what we are asking children to do online, including the sites they will be asked to access, and who from the school (if anyone) their child is going to be interacting with online.

To provide pupils with a safe environment in which to learn, the trust board and the school will take all reasonable measures to limit children's exposure to the above risks from the school's IT system. As part of this process, the trustees and the school will ensure that we have appropriate filters and monitoring systems in place and regularly review their effectiveness at least once every academic year. Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the school's DSL and IT support. It will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks.

Trustees will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. The trustees and the school will consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system and the proportionality of costs versus safeguarding risks.

School leaders will have due regard for the DfE's 'filtering and monitoring standards' and 'plan technology for your school service'.

Our IT filtering systems will be provided by a specialist external provider. This ensures that all devices and users on the network will be secure and appropriately protected. The appropriateness of any filters is also informed in part by the risk assessment required by the Prevent Duty.

We also ensure that we have the appropriate level of security protection in place in order to safeguard our systems, staff and learners and review the effectiveness of these procedures periodically (at least annually) to keep up with evolving cyber-crime technologies. We also take into account the 'cyber security standards for schools and colleges' guidance.

5.7 Safer recruitment and selection

The school will follow all guidelines and regulations on safer recruitment practice and vetting (see separate **Safer Recruitment Policy**).

The recruitment of staff will follow Government guidelines in line with the 'Keeping Children Safe in Education' and 'Safeguarding Children and Safer Recruitment' documentation and the school's Safer Recruitment Policy. All individuals (including volunteers who will be working in regulated activity) will be subjected to an enhanced DBS (Disclosure and Barring Service) check and will be checked

against the DBS Barred List (list of names barred from working with children) prior to their appointment. These checks will be updated regularly. Individuals barred from working with children and young persons will not be knowingly employed by the school. The school will immediately cease to employ an individual if it is later discovered that the individual is included in any of the above barred lists. For supply staff, the school will require the agency to provide evidence of DBS checks.

Teacher status checks will also be conducted on applicants against the DfE / Teaching Regulation Agency (TRA) database for any suspensions or prohibitions and to verify individual records (and QTS). The school will take all reasonable steps to establish this before employment. Any offer of employment will always be made on a conditional basis, subject to the relevant checks being carried out and the receipt of satisfactory references (references will be obtained prior to interview where practically possible and open testimonials will not be relied upon). The school will consider carrying out an online search as part of its due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. Where appropriate, the school (or HR) may inform shortlisted candidates that online searches will be carried out.

The school will contact TRA Teacher Services to check if a proposed governor/trustee is barred as a result of being subject to a section 128 direction.

A Single Central Record will be kept of all vetting checks, which will include verification of identity and the date these checks were made. Records on any relevant qualifications and permission to work for non-EU nationals will also be kept. The school will only use agencies that rigorously check their supply staff. Staff joining the school will familiarise themselves with the Safeguarding/Child Protection policies of the school.

It is mandatory that at least one person on any interview panel has completed Safer Recruitment training. Details of all staff and governors who have completed this training are held at the establishment.

5.8 Professional confidentiality

Confidentiality is an issue which needs to be discussed and fully understood by all those working with the pupils in school, particularly in the context of child protection. The only purpose of confidentiality in this respect is the benefit of the child.

All personal information should be treated as confidential and particular care taken with sensitive information. Information must be treated on a “need to know” basis. **Staff should only involve those who need to be involved when a disclosure is made.** Relevant factors include:

- What is the purpose of the disclosure?
- What is the nature and extent of the information to be disclosed?
- To whom is the disclosure to be made (and is the recipient under a duty to treat the material as confidential)?
- Is the proposed disclosure a proportionate response to the need to protect the welfare of a pupil to whom the confidential information relates?

Any child or young person wishing to disclose information must be informed that the member of staff has a professional responsibility to share any relevant information with other professionals who can help. No pupil should be promised that anything they say will be kept confidential if the matter is related to child protection or abuse. It is essential for the member of staff to tell the pupil that they will record anything the pupil says to ensure an exact record as possible is kept for future reference. At the same time, staff should only disclose the information to the relevant people (i.e. Designated Person).

The manner in which this message is conveyed to the young person should be done to reassure that the professional is acting in their best interests. Only people who need to know will be informed in the school such as the Designated Person responsible for safeguarding young people.

5.9 Staff code of conduct

All staff are expected to adhere to a Code of Conduct, which requires that all staff must adhere to this Policy and that all children will be treated with respect. Whilst it would be unrealistic to prohibit all physical contact between adults and children, staff should avoid placing themselves in a position where their actions might be open to criticism or misinterpretation and should exercise caution in these situations, and particularly when they are alone with pupils. For example, when giving first aid and it is necessary for the child to remove clothing for this treatment, there should be another adult present where possible.

Where a child may require regular, intimate care, the parent(s)/carer(s) will be asked to sign a form giving their permission. Similarly, another member of staff will be present where possible. Children will also be asked whether they would like an adult of the same sex to be present when possible.

Where incidents occur that might otherwise be misconstrued or where it becomes necessary to physically restrain or use force to control a child for their own safety and the safety of others, to prevent a criminal act, or to maintain good order, this will be appropriately recorded and reported to the Designated Safeguarding Lead, Headteacher and parent(s)/carer(s).

Staff should be aware of the possible risks that might arise from contact with pupils outside of school. This should not occur without prior consent and authorisation. No staff member is allowed to accompany or take pupils out for any reason, at any time, including weekends, without permission from the school and the parent(s)/carer(s). The Designated Safeguarding Lead and Headteacher will always be made aware of any such contact.

Staff are reminded of the need to maintain professional boundaries and the exchange of personal information or contact with pupils outside of the school is not permitted. Staff must not give out their personal details or contact information to pupils and neither should staff accept personal contact information from pupils.

Such instances of all the above would result in a serious breach of the Code of Conduct and safeguarding procedures and is deemed gross misconduct.

Staff must:

(Not an exhaustive list)

- Operate within the organisation's principles and guidance and any specific procedures.
- Maintain professional boundaries with pupils (or other vulnerable people) appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably.
- Act in an open and transparent way that would not lead any reasonable person to question their actions or intent.
- Provide an example of good conduct you wish others to follow.

- Ensure their behaviour and actions towards pupils (and others) are professional and must not act in a manner that would be open to criticism or misinterpretation. Think carefully about their conduct so that misinterpretations are minimised.
- Be aware that physical contact with a child may be misinterpreted and professional boundaries must be maintained.
- Remember that someone else might misinterpret your actions, no matter how well intentioned.
- Treat all children equally and with respect.
- Respect a young person's right to personal privacy/encourage young people and adults to feel comfortable and caring enough to point out attitudes or behaviour they do not like.
- Challenge unacceptable behaviour and report all allegations/suspicions of abuse.
- Recognise that special caution is required when you are discussing sensitive issues with children.
- Ensure that, whenever possible, there is more than one adult present during activities with children (or where the staff member or volunteer is under 18) or at least that you are within sight or hearing of others. If you are asked to talk in private ensure someone else knows where you are and leave a door ajar or stay in clear view, always make a note of the conversation, tell the child or young person they are free to leave or stop talking at any time.
- Be mindful of section 16 of The Sexual Offences Act 2003.

Staff must not:

(Not an exhaustive list)

- Establish or seek to establish social contact with pupils (or other vulnerable people) that you have met through your duties within this organisation. If the person seeks to establish social contact, you should exercise your professional judgement in making a response, notify management, and be aware that such social contact could be misconstrued.
- Develop or engage in personal or sexual activity/relations with a pupil or young person (even if they are over 18), or other vulnerable people, that you have met through your duties within this organisation. This would be an abuse of trust.
- Make sexual remarks to a pupil (or other vulnerable people), discuss your own sexual relationships with, or in the presence of, pupils or discuss their sexual relationships in an inappropriate setting or context.
- Have inappropriate physical contact with pupils that would be open to misinterpretation or criticism or deemed unprofessional.
- Invite a pupil to your home or arrange to see them outside set activity hours.
- Give out personal contact details or contact pupils and/or their families unnecessarily outside of activity hours.
- Give pupil gifts personally - any appropriate gifts such as token birthday gifts should come from the organisation. You should not accept gifts from pupils unless they are small token gifts appropriate to a celebration. All gifts must be reported to management.
- Lend or borrow any money or property to pupils.
- Allow yourself to be drawn into inappropriate attention-seeking behaviour/make suggestive or derogatory remarks or gestures in front of pupils.
- Jump to conclusions about others without checking facts.
- Either exaggerate or trivialise child abuse issues.
- Show favouritism to any individual.

- Rely on your good name or that of the organisation to protect you.
- Believe ‘it could never happen here, or to me’.
- Take a chance when common sense, policy or practice suggests another more prudent approach.
- Allow abusive peer activities e.g. initiation ceremonies or bullying.

5.10 Photographs/images

Photographs and images of pupils in school events or carrying out other school activities will often be on display around the school or used for promoting the positive image of the school. Parents/carers will be asked for consent. If images of pupils are requested for other purposes e.g. newspaper publication, consent will also be requested. If pupils are asked to take part in TV programmes there will be liaison with the Child Employment Officer as necessary as well as a request for consent from parents/carers.

5.11 Information sharing and the duty to share

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

As part of meeting a child’s needs, the governing board recognises the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place and understood that set out clearly the processes and principles for sharing information within the school and with local authority children’s social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

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

When deciding what information to share, we consider:

- the relevance of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

Professional judgement should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk.

This is further supported by the new “Information Sharing Duty” statutory guidance, which is intended to give staff greater confidence to share information appropriately and in a timely way to safeguard children. The governing board and the school will adhere to this guidance and recognise that it is a duty and legal requirement to share relevant safeguarding information of a child that may help another relevant person to exercise their functions to safeguard the welfare of that child.

The governing board is also aware that among other obligations, the data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

The governing board will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the data protection laws.

This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as ‘special category personal data’,
- understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows, where appropriate, practitioners to share special category personal data without the need for consent. and
- for schools, not providing pupils’ personal data in response to a Subject Access Request where the serious harm test under data protection legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harm test is met, they must withhold providing the data in compliance with schools’ obligations under the data protection laws. Where in doubt, the school will seek independent legal advice.

The data protection laws do not prevent the sharing of information for the purposes of keeping children safe.

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

Where children leave the school, the designated safeguarding lead (or a deputy) will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead will ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs coordinators (SENCOs) or the named persons with oversight for special educational needs and disabilities (SEND) in a college, are aware as required. It will then be for the designated safeguarding lead to consider what other information should be shared with other relevant staff and when appropriate to do so.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the ‘Channel’ programme and can have that support in place for when the child arrives or incidents that may indicate concerns about serious violence or harmful behaviours.

Where information indicates a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or weapon, it is incumbent on the receiving school to assess risk, and accordingly, put in place a safety and support plan for when the child arrives. It would be good practice for a conversation to take place between the designated safeguarding leads at both settings, where there are issues or concerns.

5.12 Data Protection Act and the UK GDPR

The Trust Board are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR), place duties on the organisation and individuals to process personal information fairly and lawfully and to keep the information that is held safe and secure. The Data Protection Act 2018 regulates the handling of personal data. Essentially, this is information kept about an individual on a computer or in a manual filing system. The Act lays down requirements for the processing of this information which includes obtaining, recording, storing and disclosing it.

If making a decision to disclose personal data the Data Protection Act 2018 must be complied with. This includes eight data protection principles. There should not be an obstacle if:

- There are particular concerns about the welfare of the pupil;
- Information is disclosed to social services or to another professional organisation e.g. the police;
- The disclosure is justified under the common law duty of confidence.

The trust board will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as ‘special category personal data’.
- understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for the school, not providing pupils’ personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with the school’s obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt the schools will seek independent legal advice from its Data Protection Officer.

Staff are reassured that the Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children at the school.

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. This has been recognised in principle by the Courts. Any disclosure of personal information to others (including social services departments) must always have regards to both common and statute law.

Normally, personal information should only be disclosed to third parties (including other agencies) with the consent from the subject of that information. Wherever possible, consent should be obtained before sharing personal information with third parties. In some circumstances consent may not be possible or desirable but the safety and welfare of a child dictates that the information should be shared. The law

permits the disclosure of confidential information necessary to safeguard a child. Disclosure should be justifiable in each case according to the particular facts of the case and legal advice should be sought if in doubt.

5.13 Child Protection Conferences

A Child Protection Conference may be convened by Social Services to which all involved agencies would be invited.

Where a case involves a pupil in our School a representative is usually invited to attend the meeting. The Headteacher or other Designated Safeguarding Lead may attend – the choice of this representative will depend on the circumstances of each individual case.

Staff may be requested to provide a report for a Child Protection meeting. Any report should be relevant, concise and professional. All reports should be submitted in the first instance to the Headteacher or, if not available, the Designated Safeguarding Lead.

All staff that are required to attend such meetings, prepare reports and maintain relationships with parents during and after a referral has been made will be fully supported by staff with specialist child protection training.

5.14 Multi-agency working

The school will ensure that it contributes to multi-agency safeguarding arrangements in line with the statutory guidance “*Working together to safeguard children*”. The school will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

The school will ensure it is aware of, and follow, the local safeguarding partner arrangements. The management of the school understands that the safeguarding partners should make arrangements to allow the school in the local area to be fully engaged, involved and included in the new arrangements.

The three local safeguarding partners are:

1. The local authority (LA)
2. The clinical commissioning group for the local area within the LA
3. The chief officer of police for the local area within the LA.

The school would allow access for children’s social care to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

5.15 Alternative provision

Where a pupil is placed with an alternative provision provider, we recognise that the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil’s needs.

Where pupils are in Alternative Provision, they often have complex needs. Our board and the school recognise that it is important to consider and be aware of the additional risks of harm that the pupils may be vulnerable to. In such instances, the school will assess those risks in each setting.

The school will obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can assure itself that appropriate safeguarding checks have been carried out on new staff.

The school will always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. The school will regularly review the alternative provision placements it makes. Reviews will be frequent enough (at least half termly) to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

5.16 Elective Home Education (EHE)

It is acknowledged that many home educated children have a positive learning experience. However, this is not always the case for all children and home education can mean some children are less visible to the services that are there to support them and keep them safe. It can also mean that some children are not in receipt of suitable education.

The school will follow all requirements in notifying the local authority if a child is taken off roll and removed from the school's admission register.

Where a parent/carer has expressed their intention to remove a pupil from the school with a view to home educate, the school will work with the LA and other key professionals to coordinate a meeting with the parent/carer where possible/practical. Ideally, this would be before a final decision has been made to ensure that the parent/carer has considered what is in the best interests of the pupil, particularly those that have SEND, is vulnerable and/or has a social worker.

5.17 Children requiring mental health support

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, still have an important role to play. Specifically, they can support the fulfilment of 4 key roles:

- promoting good mental wellbeing and preventing the onset of mental illness,
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one,
- ensuring early targeted support is provided, and
- liaison with/referral to specialist services where needed.

Where support is needed, the DSL (or deputy) will consider whether to inform parents or carers to support the child's wellbeing, where doing so would not place the child at additional risk.

Staff should consider the range of locally available support to meet the needs of children and young people. The school will make use of support from their respective Mental Health Support Team (MHST) where available.

5.18 Care Leavers

Local authorities have on-going responsibilities to the children who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. That plan describes how the local authority will support the care leaver to participate in education or training. The DSL will therefore have details of the local authority Personal Advisor appointed to guide and support the care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

5.19 Young Carers

The school and its staff will ensure it is alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

5.20 Children with SEND or health issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration,
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children,
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs,
- communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,
- the need for intimate care or that these children are isolated from others,
- that these children are more likely to be dependent on adults for care, and
- these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO).

The school will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

5.21 Children with medical conditions

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

5.22 Children who are lesbian, gay or bisexual

A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Schools and colleges should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

5.23 Children who are questioning their gender

The school will take a very careful approach in relation to safeguarding children who are questioning their gender or when responding to requests that the school puts support in place in order to facilitate the child to present as the opposite biological sex ("social transition").

The school recognises that it should not initiate any action in the above areas and will follow the guidance in the '*Keeping children safe in education*' document (Part 2).

5.24 Use of school premises for non-school activities (out-of-school settings)

We ensure that appropriate safeguarding arrangements are in place if in the event we hire or rent out or facilities/premises to third party organisations or individuals.

In these instances, the school will seek assurances that the provider has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed), and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The school will 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. The guidance '*Keeping children safe in out-of-school settings*' are taken into account.

5.25 Records

Child protection files with accurate records will be kept of all child protection concerns or incidents relating to individual children, secure and separate from their educational records. All records will be confidential and only accessed by the Headteacher, Designated Safeguarding Lead and authorised senior staff members where appropriate.

The school will not agree to disclose without the order of the Court where possible. Where a child moves from the school, any child protection records will be forwarded to the receiving school. A copy of the records will be kept until the child reaches the age of 25 years and will then be destroyed, according to the recommendations of the Records Management Society Guidelines for School Records.

5.26 Monitoring

All child protection incidents at the school will be followed by a review of the safeguarding procedures and a report to the Trustees. The Trustees will ensure that any weaknesses in the child protection arrangements are changed without delay.

Policies and procedures will be reviewed and updated on a regular basis, as and when necessary (and at least annually), and in accordance with new guidelines and regulations as these develop, evolve and become available, so as to keep up to date with emerging safeguarding issues and lessons learnt.

5.27 Safeguarding in the context of the Platanos College Sixth Form

Safeguarding our Sixth Form students

We will safeguard the welfare and safety of our Sixth Form students and apply the same principles and practices as we would with our pupils in Key Stage 3 and 4. We recognise that our Sixth Form students may experience or encounter unique experiences, challenges and safeguarding risks.

We will support and equip our students with the necessary skills and knowledge in order to safeguard their wellbeing and interests as they enter a new phase of their life and education. This will of course include (but not be limited to) for example:

- Dedicated pastoral support, a Designated Safeguarding Lead and welfare facilities specifically for our Sixth Form students.
- Training and information sessions on safeguarding that would build on their prior learning and training, e.g. drugs and alcohol use, sexual health and consent, sexual harassment, artificial intelligence, online safety and cyber-crime, in addition to a range of other safeguarding issues described above in this policy.
- A structured health and safety, as well as an educational, induction programme for our Sixth Form students.

Safeguarding between our Sixth Form students and secondary-aged pupils

Our Sixth Form students that are under the age of 18 are considered as children (as defined by law) – the same as secondary-age or primary-age pupils. In these circumstances, we would naturally apply the

same principles of safeguarding for all our children. However, we also recognise the potential age differences between some of the youngest and oldest children.

In ensuring that we safeguard both our Sixth Form students and our secondary-age pupils:

- Staff are aware of the potential child-on-child safeguarding risks. Leaders and all staff recognise that such potential risks can arise between Sixth Form students and younger secondary-age pupils. As such, measures are in place to ensure that these potential risks are mitigated and all pupils are safeguarded.
- All of our Sixth Form students are accommodated in our separate Sixth Form Centre. The centre is entirely segregated from the rest of the school. For example:
 - Our Sixth Form students have their own separate entry into the college. This is not used by any other pupils.
 - Our Sixth Form students have their own toilet spaces, welfare spaces, common areas, and do not share these spaces with any other pupils from the other Key Stages.
 - There are clear signages that designate the Sixth Form Centre spaces. These spaces are out of bounds to other pupils. Physical separation of the buildings ensure that our Sixth Form students do not mix with our secondary-age pupils.

We also recognise the scenario where our Sixth Form students may be aged 18 or above. In those instances, we acknowledge that there remains a duty to safeguard them as students of Platanos College Sixth Form. At the same time, they are also deemed as adults (as defined by law).

We therefore have measures in place to safeguard any potential risks associated with inappropriate interactions between ‘adult-aged’ Sixth Form students and our secondary-age children. For example:

- There is a clear code of conduct specifically for our Sixth Form students.
- All of our Sixth Form students are not permitted to interact with our secondary-age pupils (and vice versa).
- There is a segregation of spaces between our Sixth Form students and secondary-age pupils.
- Dedicated Sixth Form staff supervise and monitor the Sixth Form spaces.
- Where our Sixth Form students require access to the main school on the rare occasion, it is strict policy that they are physically escorted and supervised at all times by an authorised member of staff.

The above prevents the possibility of any situations arising where it may be open to misinterpretation between pupils or compromise the safeguarding of children. Equally, this balances the duty to safeguard our Sixth Form students and our secondary-age pupils.

6. ROLES AND RESPONSIBILITIES

Responsibilities: Board of Trustees

1. The board of trustees will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
2. The board will ensure that the school meets its statutory duties with regard to safeguarding and protecting children in line with the provisions set out in the statutory guidance *'Keeping Children Safe in Education'*.
3. The board will ensure that the following are in place:
 - Safeguarding and child protection policies and procedures in place are consistent with the Local Safeguarding Partners' procedures and national guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
 - A staff code of conduct including policies covering staff/pupil relationships and communication (including acceptable use of technologies, use of mobile devices and social media).
 - Appropriate safeguarding arrangements in place to respond to children who go missing from education, particularly on repeat occasions.
 - Safer recruitment procedures are in place.
4. The board will challenge the school's senior management team on the delivery of this policy and monitor its effectiveness.
5. The board will review this policy every year (as a minimum) and may update as and when necessary and adopt it in accordance with any new legislation or guidance to keep it up to date with developing safeguarding issues as they emerge and evolve, including lessons learnt.
6. The board will ensure that a senior member of staff is appointed the Designated Safeguarding Lead (DSL), as well as deputies, with responsibilities for carrying out the statutory duties as set out in this policy.
7. The school has a Designated Trustee for Safeguarding responsible for advocating child protection and safeguarding issues within the school. This person will liaise with the Headteacher and the Designated Safeguarding Lead and report to the board on safeguarding matters.
8. Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
9. Recognise the importance of information sharing between practitioners and agencies and ensure arrangements are in place that facilitate and set out the processes for doing so.
10. Ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and

procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

11. Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Responsibilities: All staff/practitioners/volunteers/members of the organisation

1. All staff must read and be familiar with the current version of the DfE guidance ‘Keeping Children Safe in Education’ (Part 1).
2. Be familiar with safeguarding and child protection, as well as the contents of this policy, and follow the school’s procedures and protocols in this regard to promote and safeguard the welfare of children and know who to contact (identities of the Designated Safeguarding Lead and deputies) to raise concerns about a child’s welfare.
3. Be alert and aware of indicators/signs of abuse, neglect and exploitation – and take an “it can happen here” approach. **If staff are unsure, they should always speak to the Designated Safeguarding Lead (or deputies).**
4. Be aware of all specific safeguarding issues and categories of abuse (**as outlined in Section 4**).
5. All staff have a responsibility and a role in safeguarding children, be able to **recognise** signs and identify concerns, **respond** by sharing information and their concerns (with the appropriate people e.g. DSL) and taking **immediate** and appropriate action according to the school’s procedure. If staff have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told.
6. Be familiar with the school’s behaviour policy, staff code of conduct and disciplinary rules and similar policies.
7. Be aware of their local early help process and understand their role in it. This means speaking to the DSL as soon as possible if you have any safeguarding concerns that emerge at any point.
8. Be prepared to identify children who may benefit from early help and contact the DSL. 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. This will involve the school, our DSL and local agencies working together to provide early support.
9. Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.
10. Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

11. Remember that an allegation of child abuse or neglect may lead to a criminal investigation, so do not do anything that may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse.
12. All adults in the school are required to be vigilant and report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead and/or Headteacher. All children have an absolute right to a childhood free from abuse, neglect or exploitation. All members of the school have a responsibility to be mindful of these issues related to children's safety and welfare and a duty to report and refer concerns, however minor they may appear to be (**NB:** it is not the role of the school staff reporting the concern to investigate those concerns, but to seek clarification and report to the Designated Safeguarding Lead).
13. Report instances or suspected cases of female genital mutilation (FGM) to the Designated Safeguarding Lead and the police. The school acknowledges that this is mandatory.

Responsibilities: Headteacher

1. In addition to the responsibilities outlined above, to ensure that all procedures are monitored and implemented as according to this policy and statutory requirements. Ensure that these are followed by all staff.
2. To work with, and report to, the Trustees on a regular basis in relation to safeguarding matters at the school.
3. To work with the DSL and ensure the effective management of safeguarding matters.
4. The DSL or a deputy will normally always be available to discuss safeguarding concerns. If in exceptional circumstances the DSL (or deputies) is not available, this should not delay appropriate action being taken. Staff can contact the Headteacher or Executive Headteacher and any action taken will be shared with the DSL as soon as is practically possible.

Responsibilities: Designated Safeguarding Lead (DSL) (and deputies as appropriate)

The school will have a senior member of staff who has designated responsibility for child protection/safeguarding (the DSL), and at least one deputy, and who must receive appropriate training in dealing with child protection concerns. The DSL and deputy (or deputies) will fulfil their roles at the school according to the "Keeping children safe in education" requirements.

1. Act on all reported concerns immediately and appropriately.
2. Take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).
3. Lead and initiate early help as and when appropriate.
4. Referring a child, if there are concerns about possible abuse, to the multi-agency safeguarding hub/social care services of the local authority. Referrals should be made in writing, using the online multi-agency referral form.

5. Liaising with other agencies and professionals, e.g. the safeguarding partners, in line with the 'Working together to safeguard children' guidance.
6. Keep the Headteacher/Head of School informed of any safeguarding/child protection issues.
7. Acting as a focal point for staff to discuss concerns and provide advice.
8. Keeping a separate child protection file with full written records of concerns about a child even if there is no need to make an immediate referral. Ensuring that all such records are kept confidentially, securely and separate from the pupil records. The file will have clear, comprehensive records of all concern(s), discussions, details of (any) referrals made, details of how the concern was followed up and how it was resolved, actions taken, decisions made, reasons for those decisions, potential next steps (where appropriate) and outcomes. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.
9. Ensuring that an indication of further record-keeping is marked on the pupil records.
10. Ensuring that when a pupil with a Child Protection Plan leaves, their file/information is transferred to the new school within the required timeframes as set out by regulations and the KCSIE, and the child's social worker is informed.
11. Ensuring that either they or the class teacher attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report which has been shared with the parents.
12. Organising safeguarding induction, and update training at least every year, for all school staff.
13. Undergo appropriate training themselves to ensure they have the knowledge and skills required to carry out their role of DSL. The training should be updated every two years. In addition to their formal training, the DSL's knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.
14. Promoting good safeguarding practices and raising awareness throughout the establishment.
15. Providing, with the Headteacher, regular reports for the Trust Board, detailing any changes to the policy and procedures; training undertaken by the Designated Safeguarding Lead, and by all staff and governors; number and type of incidents/cases, and number of children on the child protection register (anonymised).
16. Should consider whether it is appropriate to share any information with the new school or college in advance of a pupil leaving, in addition to the child protection file.
17. Be aware of all specific safeguarding issues and categories of abuse (**as outlined in Section 4**).
18. Be aware of the contact details and referral routes of the Local Housing Authority to be able to raise concerns. Referrals to the Local Housing Authority should not replace referrals to children's social care where a child is being harmed or at risk of harm.

Availability

19. During term time the designated safeguarding lead (or a deputy) should always be available (during school) for staff in the school to discuss any safeguarding concerns. In exceptional circumstances, this may be via phone and/or Microsoft Teams or other such media. The school and DSL will ensure that they arrange adequate and appropriate cover arrangements for any out-of-hour/out of term activities.
20. The school ensures that it has at least one Deputy DSL to ensure robust and adequate cover.

Manage referrals

21. The designated safeguarding lead is expected to refer and manage safeguarding cases and fulfil this area of responsibility as according to the “Keeping children safe in education” guidance.

Working with others

22. The designated safeguarding lead is expected to support and work with a range of people, such as staff, external agencies and similar, and fulfil this area of responsibility as according to the “Keeping children safe in education” guidance.

Information sharing and managing the child protection file

23. The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date and information is shared/transferred as appropriate and fulfil this area of responsibility as according to the “Keeping children safe in education” guidance.

Raising awareness

24. The DSL should ensure that staff are aware of the safeguarding and child protection policy and procedures and raise awareness of these. The DSL will fulfil this section of their responsibility as according to the “Keeping children safe in education” guidance.

Training, knowledge and skills

25. The DSL (and deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. The DSL will fulfil this section of their responsibility as according to the “Keeping children safe in education” guidance.

Providing support to staff

26. Training should support the designated safeguarding lead (and deputies) in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. The DSL will fulfil this section of their responsibility as according to the “Keeping children safe in education” guidance.

Understanding the views of children

27. It is important that children feel heard and understood. The DSL will develop knowledge and skills to encourage a culture of listening, take account of pupils’ views, understand the difficulties that children may have in approaching staff about their circumstances, and facilitate trusted communication. The DSL will fulfil this section of their responsibility as according to the “Keeping children safe in education” guidance.

Holding and sharing information

28. The DSL will fulfil this section of their responsibility as according to the “Keeping children safe in education” guidance.

Responsibilities: Designated Teacher

1. The school has an appointed 'designated teacher'. The appointed designated teacher is to work with the local authority and promote the educational achievement of registered pupils who are looked after.
2. These are pupils who have **left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.**
3. Work with Virtual School Heads (who manage pupil premium plus for looked after children) to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher will also work with them to promote the educational achievement of previously looked after children.
4. The 'designated teacher' will have appropriate training and the relevant qualifications and experience.

PART 3: CHILD PROTECTION PROCEDURES

7. PROCESSES FOR SAFEGUARDING YOUNG PEOPLE

There are four key processes that underpin work with young people in need and their families. Each needs to be carried out effectively in order to achieve improvements in the lives of young people in need.

- Assessment of needs
- Planning of services
- Intervention
- Reviewing of services

School personnel will need to develop skills that enable them to look for changes in behaviour. These need to be personal, for example an exuberant child becoming withdrawn or a normally quiet child becoming more excitable.

- The role of school staff is to report a concern/make a referral, **not** to conduct an investigation.
- Always act promptly.
- In order for an individual to obtain the help they need, the following referral process needs to be observed.



8. CHILD PROTECTION PROCEDURES AND ACTION

Procedures for all staff/volunteers/visitors with a safeguarding concern or where a disclosure or report of abuse is made to them

1. Must be vigilant in order to identify potential incidences of abuse or neglect.
2. All concerns related to the safeguarding issues and categories of abuse to a child outlined in **Section 4** of this policy should be reported following this child protection procedure. This includes reports of sexual violence or sexual harassment between peers.
3. If possible, a disclosure/report particularly in relation to sexual violence or harassment is managed with two members of staff present. However, this might not always be possible or practical.
4. Report instances or concerns immediately to the Designated Safeguarding Lead or (if unavailable) the Deputy Designated Safeguarding Lead or Headteacher, using the appropriate 'concern form'. Do not investigate the concerns, but report them.
5. Should request medical attention if required without delay. All evidence (e.g. notes and computers) must be safeguarded and preserved. Please refer to the Health and Safety and First Aid Policy.
6. Must listen carefully to the child, keep an open mind, reflect back, using the child's language, being non-judgmental, being clear about boundaries and how the report/disclosure will be progressed. Staff should not take a decision as to whether or not the abuse has taken place.
7. Staff must not ask leading questions, i.e. a question which suggests its own answer. Only prompt the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
8. Must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to share the information with the DSL who will ensure that the correct action is taken. Staff should only share the information with authorised personnel (e.g. DSL).
9. Must keep an accurate written record of the conversation held with the person making the disclosure (including full names, date(s), time(s), location (if applicable), verbatim dialogue).
10. Consider the best way to make a record of the report. Best practice is to wait until the end of the report/disclosure and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made.**
11. Only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. You should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.
12. Must complete any documentation for external agencies where appropriate.
13. Where the report of sexual abuse or sexual harassment includes an online element, be aware of the DfE advice 'Searching, screening and confiscation at school' and UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'. **The key**

consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

Procedures for the Designated Safeguarding Lead

1. To co-ordinate actions in the school with the Headteacher and liaise with the relevant external agencies where necessary over suspected or actual cases of child abuse once reported.
2. Follow up and document reported concerns and assess whether a referral is necessary.
3. Contact the local authority children's social care services and refer the concern to them for early help or child protection if necessary.
4. To identify the signs and symptoms of abuse and decide when to make a referral and to ensure that staff observe and implement the school's procedures.
5. Take into account the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to Children's Social Services or the police. The school has no discretion in this matter.
6. Take into account the wishes of the pupil who complained provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes.
7. Take into account the wishes of the pupil's parents provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary to override parental wishes in some cases. If the Designated Safeguarding Lead is concerned that disclosing information to parents would put a child at risk, he/she will take further advice from the relevant professionals before making a decision.
8. If the abuser is also a pupil (a peer), the needs and impact on themselves will also need to be taken into account and safeguarding/child protection measures will also be applied. Recognise that the behaviour of the perpetrator is also harmful to themselves (as they are also a child) who may have witnessed the behaviour or have been exposed to harm themselves.
9. When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
 - the victim, especially their protection and support;
 - whether there may have been other victims;
 - the alleged perpetrator(s); and
 - all the other children, (and, if appropriate, adult pupils and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the DSL and school should be actively considering the risks posed to all their pupils and put adequate measures in place to protect them and keep them safe.

The DSL (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. Any such professional assessments should be used to inform the school's approach to supporting and protecting the pupils and updating their own risk assessment.

10. To fully update records of reports and referrals made, including actions taken, potential next steps (where appropriate) and outcomes.
11. Consider the duties of confidentiality, so far as applicable.

Note(s):

If a pupil is felt to be in need of protection and becomes the subject of a Child Protection Plan, parents/carers should regard the school as a source of help and support.

It is important to remember that a referral or consultation with Social Care/Family Services is an expression of concern about a child's welfare. It is not an accusation or a presumption of responsibility about a parent or carer.

In the course of an investigation, social workers or the police may wish to speak with a child, without parental knowledge or consent. The Headteacher, acting in "loco parentis", has the discretion to agree to this to enable the authorities to explore concerns and determine whether there are grounds for further action. In these cases the Headteacher will ensure that the child's welfare is secured and he/she has access to a trusted adult.

9. DISCLOSURE

9.1 Disclosure may arise in a number of ways

- Raising a concern with a pupil based on observation.
- Student approaching a member of staff.
- Colleague or peer sharing information.

9.2 Managing disclosure: what do children need?

- Please consider what children and young people need to safeguard them from harm and promote their welfare, and what factors can help or hinder a young person's development.
- Think about children's physical, emotional and learning needs.
- Also consider any specific needs for disabled children or those from black or ethnic minority families.

9.3 Guidance on managing a disclosure/report of abuse

- Depending on your role, you do not need to find out all of the details prevailing in a situation since the DSL will follow up the situation. **Respond immediately by contacting and reporting**

the concern to the DSL or a deputy (if you are not the DSL) and using the appropriate ‘concern form’.

- Stay calm and reassuring. Listen to and take the information given to you by the young person seriously.
- Confirm in a positive manner that the young person has done the right thing in telling you about their concern.
- Convey verbally and by non-verbal communication that you know how difficult it might be for them to tell you about such difficult experiences.
- If taken by surprise, try and find a space where information can be discussed in privacy as soon as possible.
- Address the issue of confidentiality and the possible involvement of others where appropriate, so that the young person is made aware of your responsibilities.
- Be supportive and give realistic encouragement.
- Avoid asking leading questions such as “Who did that?”, “Tell me their name?”.
- However, some questions may need to be asked especially relating to the young person’s safety for example, “Are you going to be safe when you leave school?”, “Who will be at home tonight?”.
- If it seems important to have more information ask more open questions such as “Are you able to tell me more?”.
- Reflect back what the young person has said rather than asking direct questions.
- Avoid interrupting the young person during a disclosure.
- Some situations may need immediate action and may not be able to wait such as reporting a very recent sexual or physical assault where the young person may still have useful forensic evidence on their person, in which case the designated person and the police may need to be contacted.
- Reassure the pupil and avoid blame.
- On the report of sexual violence or sexual harassment in particular, important considerations include:
 - The wishes of the victim in term of how to they want to proceed.
 - The nature of the alleged incident(s) including whether a crime has been committed or whether harmful sexual behaviour (HSB) has been displayed.
 - Ages of the children involved.
 - The developmental stages of the children involved.
 - Any power imbalance between the children.
 - If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).
 - That sexual violence and sexual harassment can take place within intimate personal relationships between children.
 - Importance of understanding intra familial harms and any necessary support for siblings following incidents.
 - Are there ongoing risks to the victim, other children, or school staff.
 - Other related issues and wider context, including links to CSE and CCE.

- There are four scenarios to consider for managing reports of sexual violence and sexual harassment. These are:
 - Manage internally – in some cases of sexual harassment, for example, one-off incidents where the school is of the view that the children concerned are not in need of early help or a referral and that it would be appropriate to handle the incident internally perhaps through the behaviour policy and pastoral support. Whatever the response, it should be a zero-tolerance approach and all actions, decisions and reasons are recorded.
 - Early help is utilised where it is deemed beneficial and a referral to statutory services is not required. Again, all actions, decisions and reasons are recorded.
 - Referral to children’s social care using the recognised child protection channel.
 - Reporting to the police. This is generally in parallel with a referral to social care.

10. RESPONSE FOLLOWING REPORT/DISCLOSURE

10.1 Do

- Respond by contacting and reporting your concerns/the disclosure to the DSL immediately and complete the necessary ‘concern form’.
- Be prepared to respond calmly. Children are more likely to allow you to help them if you are prepared to listen and appear not to panic.
- Keep a clear record of your concerns and what action you took.
- Make yourself aware of school procedures for responding to suspected abuse.
- Consult your Designated Safeguarding Lead at the school (or the social services depending on your role).
- Where circumstances allow be honest as possible with parent(s)/carer(s) about your concern and actions.

10.2 Do not

- Promise the child that you will not tell anyone else. Instead explain that to help them stop the abuse you will need to talk to other people.
- Try to "go it alone". Children are best protected when all agencies do work together.

10.3 Receive and reassure

- Listen to the child. If you are shocked by what they tell you, try not to show it. Take what they say seriously. Children rarely lie about abuse and to be disbelieved adds to the traumatic nature of disclosing. Children may retract what they have said if they meet with revulsion or disbelief.
- Accept what the child says. Be careful not to burden them with guilt by asking “Why didn’t you tell me before?”
- Empathise with the child – do not tell them what they should be feeling.
- Stay calm and reassure the child that they have done the right thing in talking to you.

- Reassure them that they are taken seriously regardless of how long it has taken them to come forward, that they will be supported and kept safe, and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.
- Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously.
- A victim should never be given the impression that they are creating a problem by reporting abuse, including sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
- It is essential to be honest with the child, so do not make promises you may not be able to keep, e.g. “I’ll stay with you” or “Everything will be all right now”.
- Don’t promise confidentiality: you have a duty to refer a child who is at risk.
- Try to alleviate any feelings of guilt that the child displays. For example, you could say: “You’re not to blame” or “You’re not alone, you’re not the only one this sort of thing has happened to”.
- Acknowledge how hard it must have been for the child to tell you what happened.

10.4 Reaction

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter; but do not “interrogate” them for full details.
- Do not ask “leading” questions such as: “What did he do next?” (this assumes that he did!) or “Did he touch your private parts?”. Such questions may invalidate your evidence (and the child’s) in any later prosecution in court. Instead ask open questions like, “Anything else to tell me?”, “Yes?” or “And?”.
- Do not criticise the perpetrator: the pupil may love him/her and reconciliation may be possible.
- Do not ask the pupil to repeat everything to another member of staff.
- Explain what you have to do next and to whom you have to talk.
- Inform the designated teacher for child protection.
- Try to see the matter through yourself and keep in contact the pupil.
- Ensure that if a Social Care Interview is to follow, the pupil has a “support person” present if they wish (possibly yourself).

10.5 Record

- Make some very brief notes at the time on any paper which comes to hand and write them up as soon as possible.
- Do not destroy your original notes in case they are required by a court.
- Record the date, time, place, and who else was around; any noticeable non-verbal behaviour and the words used by the child. If the family uses their family’s own private sexual words, record the actual words use, rather than translating them into “proper” words.
- Draw a diagram to indicate the position of any bruising.

- Be objective in your recording: include statements and observable things, rather than your interpretations or assumptions.

10.6 Support

- Make sure that you continue to support the child, providing time and a safe space throughout the process of investigation and afterwards.
- Get some support for yourself, without disclosing confidential information about the child to colleagues.

10.7 Acting on concerns

- Act on and report your concern(s) immediately to the DSL. All concerns, discussions and decision made, and the reasons for those decisions, will be recorded in writing by the DSL.
- Children have a right to be safe and well.
- Adults have a responsibility to safeguard children.
- You have one small piece of the jigsaw.
- Abuse and neglect are damaging.
- If children and families are given help it can stop a child from being harmed.
- Child abuse and neglect continue because of the secrecy and silence that surround them.
- Children rarely lie about abuse.
- An abuser may abuse many other children who also have a right to protection.

10.8 Unsubstantiated, unfounded, false or malicious disclosures

- If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care maybe appropriate and considered.
- If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the pupil who made it, as per our behaviour policy.

11. SAFEGUARDING REFERRAL

If you are responsible for making referrals (the DSL):

- Know who to contact in police, health, education, school and children's social care to express concerns about a child's welfare.
- Refer any concerns about child abuse or neglect to children's social care or the police. Social care services should be called same day for urgent matters and followed up with a completed online referral form. If the pupil is in immediate danger, the police should be called straight away.
- Written referrals to children's social services are made using the online multi-agency referral form (MARF) for early help or child protection.
- The DSL does not have to be absolutely certain that there is child abuse before a referral is made. The DSL may wish to call and speak to the social care team in the first instance for advice and consultation.
- Have an understanding of the Framework for the Assessment of Children in Need and their Families, which underpins the processes of assessing needs, planning services and reviewing the effectiveness of service provision at all stages of work with children in need and families. (The dimensions of the Common Assessment Framework (2006b) are based on those in the Assessment Framework.)
- Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that the school and DSL provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.
- When referring a child to children's social care you should consider and include any information you have on the child's developmental needs and their parents'/carers' ability to respond to these needs within the context of their wider family and environment. This information may have been obtained during the completion of a Common Assessment (2006b).
- Similarly, when contributing to an assessment or providing services you should consider what contribution you are able to make in respect of each of these three domains.
- Specialist assessments, in particular, are likely to provide information relevant to a specific dimension, such as health, education or family functioning.
- See the child and ascertain his or her wishes and feelings as part of considering what action to take in relation to concerns about the child's welfare.
- Making a referral – additional considerations:
 - This is my worry
 - This is what I have seen and/or heard: when, who from and where
 - This is what I have done
 - What more do I need to do?
 - Are parent(s)/carer(s)/child aware of this referral?

- How will you let me know what is going to happen next?
- What is your name?
- Who should I speak to if I am not happy with what you say or do?
- Do you know if there are professionals involved (e.g. a psychologist, school nurse, health visitor)?
- Is the child disabled and in what ways?
- How do the child and family communicate, in what language?
- Do they use other ways of communicating, e.g. signing?
- Do you know the name and address of the child's GP?
- Put your concerns in writing within 48 hours.

12. CONCERNS, COMPLAINTS OR ALLEGATIONS AGAINST STAFF (INCLUDING SUPPLY, TRAINEE TEACHERS, VOLUNTEERS AND CONTRACTORS)

Allegations that may meet the harm threshold

1. This procedure should be used in any case in which it is alleged that a staff member (including supply staff), governor/trustee, visiting professional or volunteer has:
 - a. Behaved in a way that has harmed a child or may harm a child;
 - b. Possibly committed a criminal offence against or related to a child;
 - c. Behaved towards a child or children in a way that indicates he/she may pose a risk of harm to children;
 - d. Behaved or may have behaved in a way that indicates he/she is unsuitable to work with children or may pose a risk of harm to children. **This includes behaviour that may have happened outside of the school that might make an individual unsuitable to work with children – this is known as transferable risk.**
2. A person satisfies the harm test if they may harm a child or vulnerable adult or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or vulnerable adult.
3. Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in schools to abuse children.
4. The school takes all complaints made against members of staff seriously. Procedures are in place for pupils, parents/carers and staff to share any concerns.
5. All staff must report any potential safeguarding concerns about an individuals' behaviour towards children immediately. Allegations or concerns about colleagues (including volunteers) and visitors must be reported directly to the DSL and Headteacher unless the concern relates to the DSL/Headteacher. Concerns about supply staff should be referred to the Headteacher.
6. All concerns/complaints regarding child protection will be brought immediately to the attention of the Headteacher who will consider whether an onward referral to the Local Authority Designated Officer (LADO) is required, or may consult the LADO and the Designated Governor/Trustee where appropriate. **A separate Concerns and Complaints Policy is also available where applicable.**
7. If the subject of complaint is the Headteacher, it should be brought to the attention of the Executive Headteacher/Chief Executive and/or Chair of Trustees/Designated Trustee who may consult the LADO if appropriate.
8. If the subject of complaint is a Governor/Trustee, it should be brought to the attention of the Executive Headteacher/Chief Executive and/or LADO.
9. The normal disciplinary procedures should also be followed.
10. Where it appears that a criminal offence may have been committed, this will be reported jointly to the police.

11. Staff who are formally disciplined for any abuse of pupils (or who resign before disciplinary action can be instigated) will be notified to the Disclosure and Barring Service (DBS) and TRA for possible inclusion on their list of persons barred from working with children and young people.
12. To ensure that a thorough investigation takes place, the person in question may be required to leave the premises during the course of the investigation.
13. All staff and volunteers should feel able to raise any concerns about poor or unsafe practice/behaviour. All such concerns will be taken seriously by the senior leadership team. All staff can raise concerns with the school or Trust. The whistleblowing policy is available in exceptional circumstances.
14. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.
15. Where the school is not the employer of an individual, they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (including agencies and their supply staff).
16. It is essential that any allegation of abuse made against a teacher or other individual in the school is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation.
17. Some cases may well either not warrant consideration or either a police investigation or enquiries by the LA/social services. In these cases, local arrangements should be followed to resolve cases. Some allegations will also be so serious that they require immediate intervention by social services or the police.
18. The following definitions should be used when determining the outcome of allegation investigations:
 - Substantial – there is sufficient evidence to prove the allegation.
 - Malicious – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
 - False – there is sufficient evidence to disprove the allegation.
 - Unsubstantiated – there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
 - Unfounded – to reflect cases where there is no evidence or proper basis which supports the allegation being made.
19. The case manager handling the case should discuss the case with the DSL. The initial sharing of information and evaluation may lead to a decision that no further action is necessary in regard to the allegation, in which case this decision and a justification for it should be recorded by both the case manager and the DSL and agreement reached on what information should be put in writing to the individual concerned and by whom.
20. The case manager should inform the accused person about the allegations. However, where a strategy discussion is needed, or police or social care need to be involved, the case manager should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

21. Ultimately the options open to the school depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position; an individual should be suspended only if there is no reasonable alternative.
22. If the allegation is substantiated and:
- the person is dismissed, resigns or otherwise ceases to provide their services; or
 - the employer ceases to use the person's services,
- the employer has the legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
23. In the case of a teaching staff, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.
24. The school notes that there is a legal requirement for it to make a referral to the DBS where it considers an individual has engaged in conduct that harmed (or is likely to harm) a child, or if a person otherwise poses a risk of harm to a child.

Concerns that do not meet the harm threshold ('lower level' concerns)

25. 'Lower level' concerns and allegations that do not meet the harm threshold does not mean that it is insignificant; it simply means that the behaviour towards a child does not meet the harm threshold.
26. By definition, a 'low level' concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that:
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
 - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
27. Examples of such behaviour could include, but are not limited to:
- being over friendly with children;
 - having favourites;
 - taking photographs of children on their mobile phone;
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
 - using inappropriate sexualised, intimidating or offensive language.
28. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
29. Staff will be encouraged to share such 'low level' concerns (as outlined above) responsibly and confidentially with the DSL and Headteacher.

30. These concerns will all be recorded in writing, be held securely on file in line with data protection regulations and dealt with appropriately. The record should include details of the concern, the context in which the concern arose and the action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
31. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Headteacher should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.
32. Ensuring that these are dealt with effectively will also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Supply teachers, all contracted staff, trainee teachers and volunteers

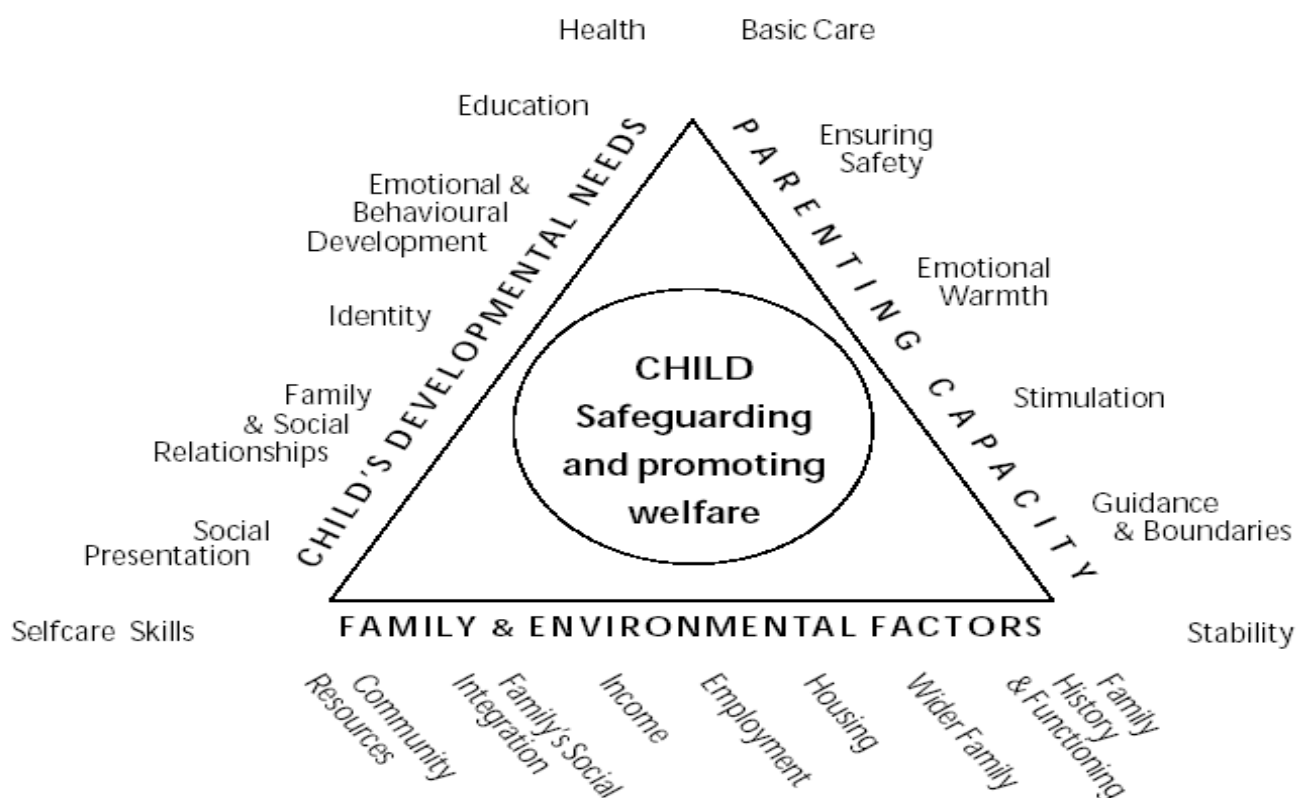
33. The school will follow the same procedures as described for those that are not directly employed by the Trust, e.g. supply staff. The school may involve the LADO and inform the supply agency, who are expected to be fully involved and co-operate. Where this applies in these instances, the school will share safeguarding responsibilities with the agency or business.
34. Where concerns or allegations relate to a trainee teacher placed within the school, the expectations of schools set out above in relation to investigating, handling and referral also apply. In addition, teacher training providers are expected to follow the same procedures as set out for supply agencies.
35. The school will also fulfil its duty to refer an individual to the DBS in relation to safeguarding concerns about individuals as listed above (including volunteers) in accordance with the 'Keeping children safe in education' guidance.

Organisations or individuals using the school premises

36. The school will follow the same procedures as described in this section for allegations relating to any incident that happened when an individual or organisation (third party) was using the school premises for the purposes of running activities for children. As with any safeguarding allegation, the school will follow its safeguarding policies and procedures, including informing the LADO.

APPENDIX 1

ASSESSMENT FRAMEWORK TRIANGLE

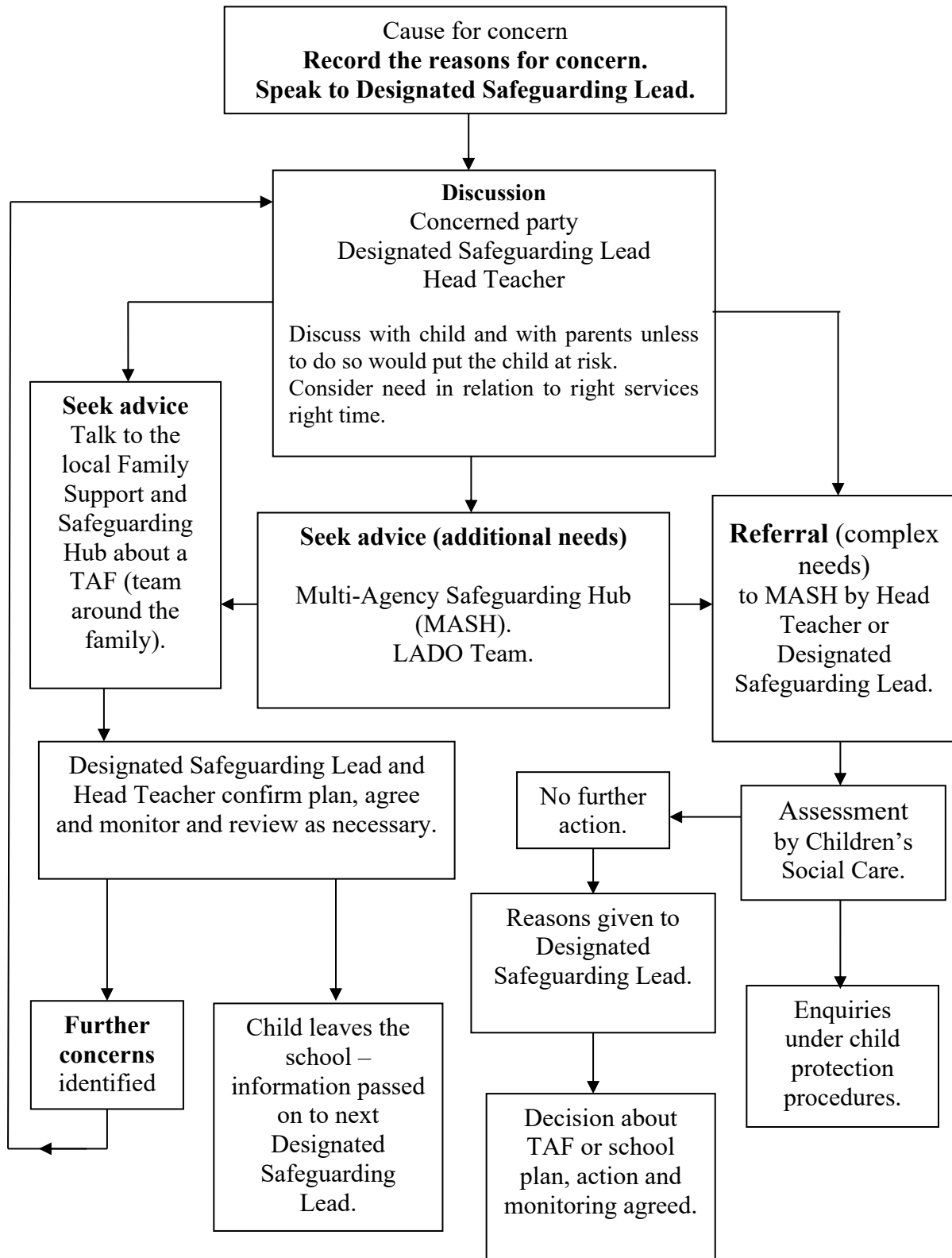


What are the kinds of things that worry us?

From the DfE '*Framework for the Assessment of Children in Need and their Families*' (although archived guidance, it nevertheless provides a helpful source of information and guidance).

APPENDIX 2

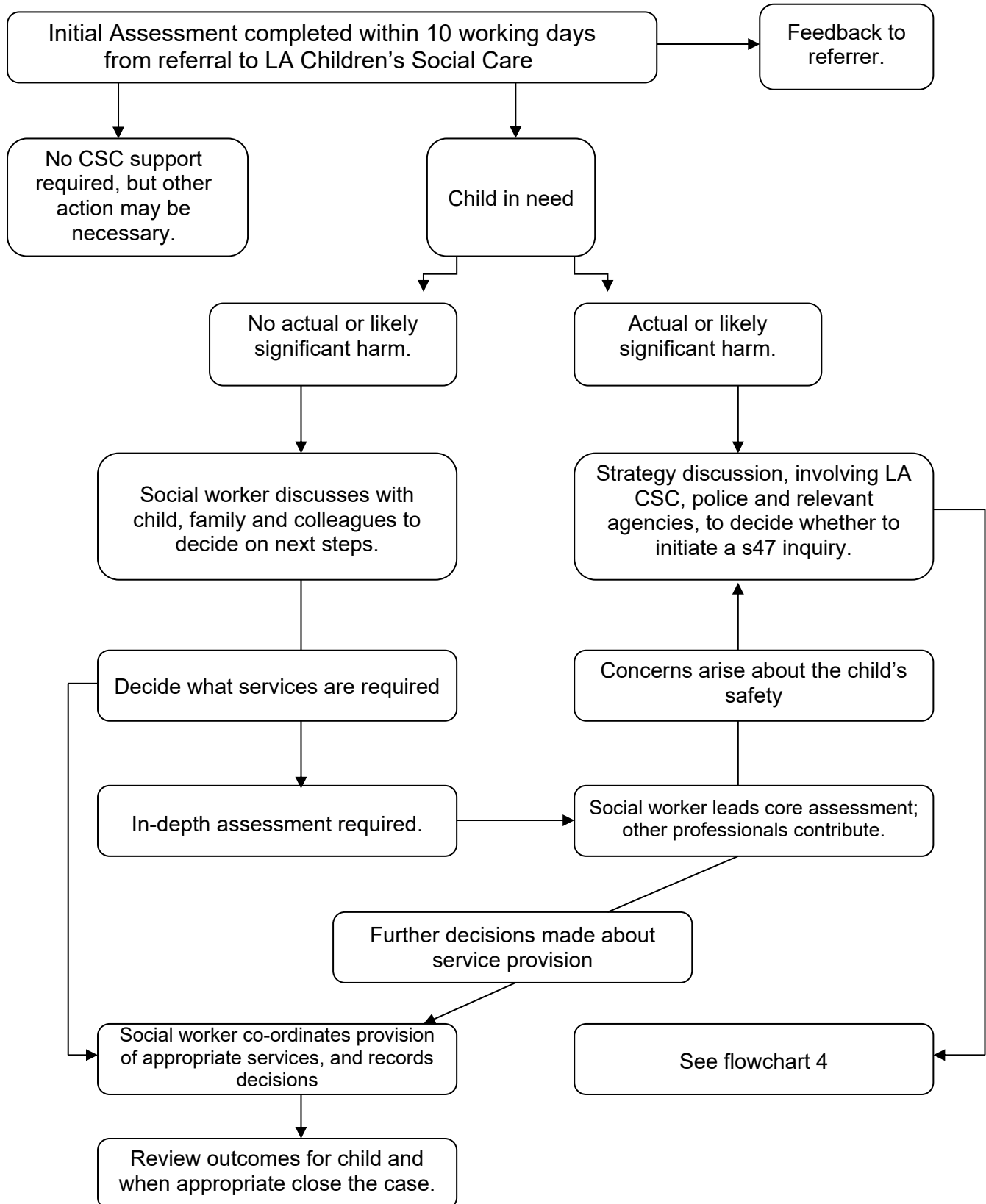
RESPONDING TO CONCERNS ABOUT A CHILD



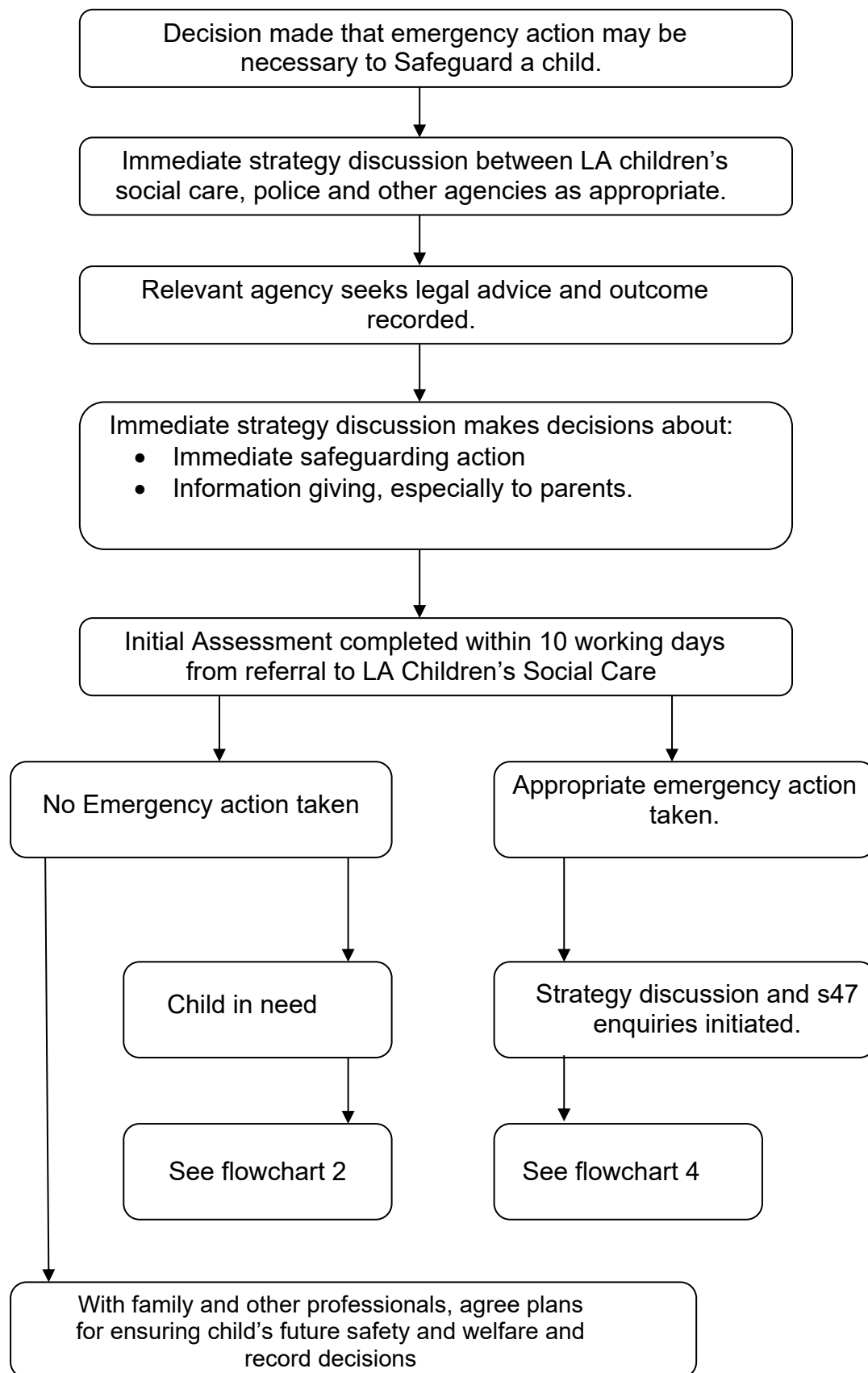
APPENDIX 3

WHAT HAPPENS NEXT?

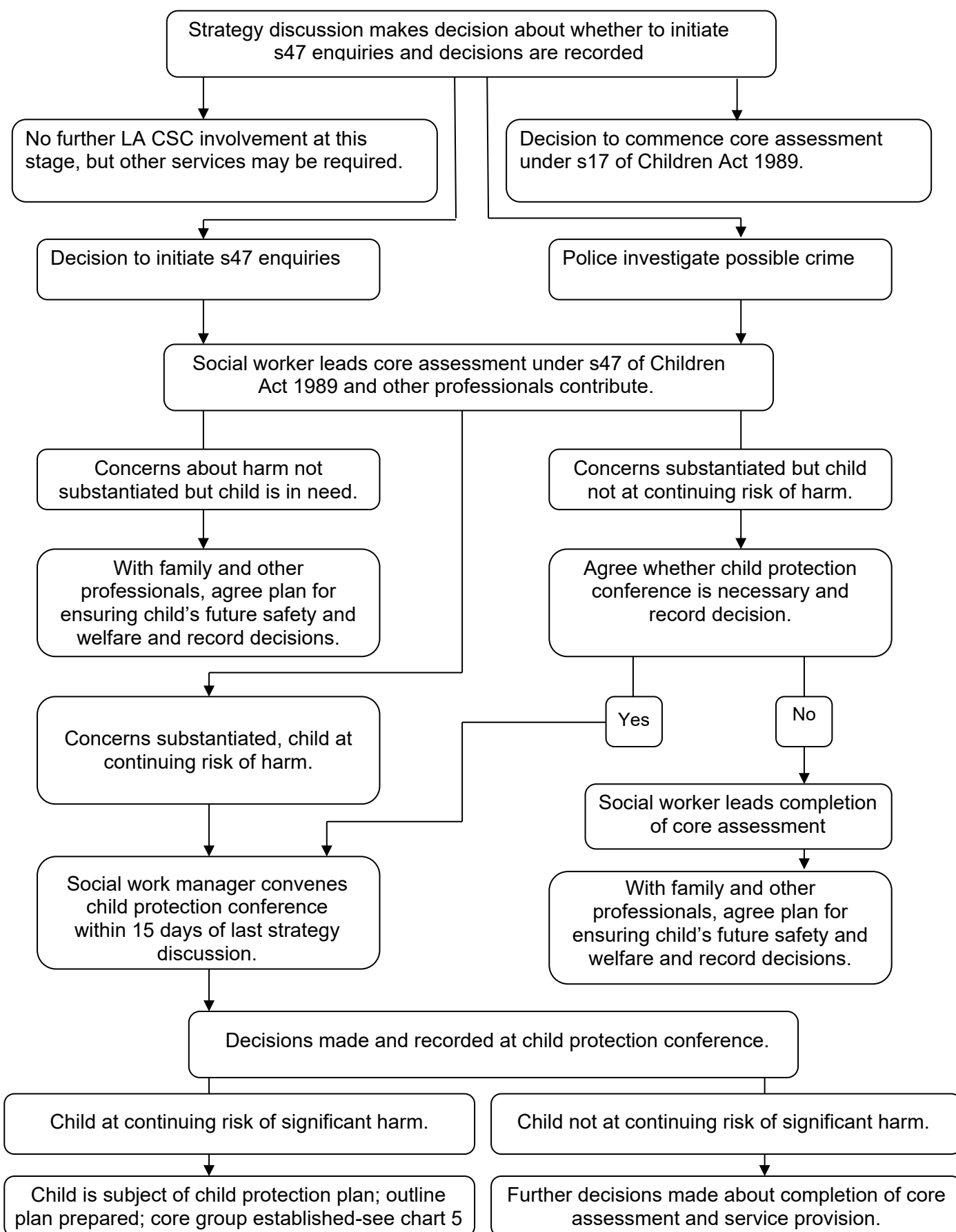
The following flowchart (2) is from “What to do if you’re worried a child is being abused” and shows what happens after a referral to Social Care has led to an “initial assessment”.



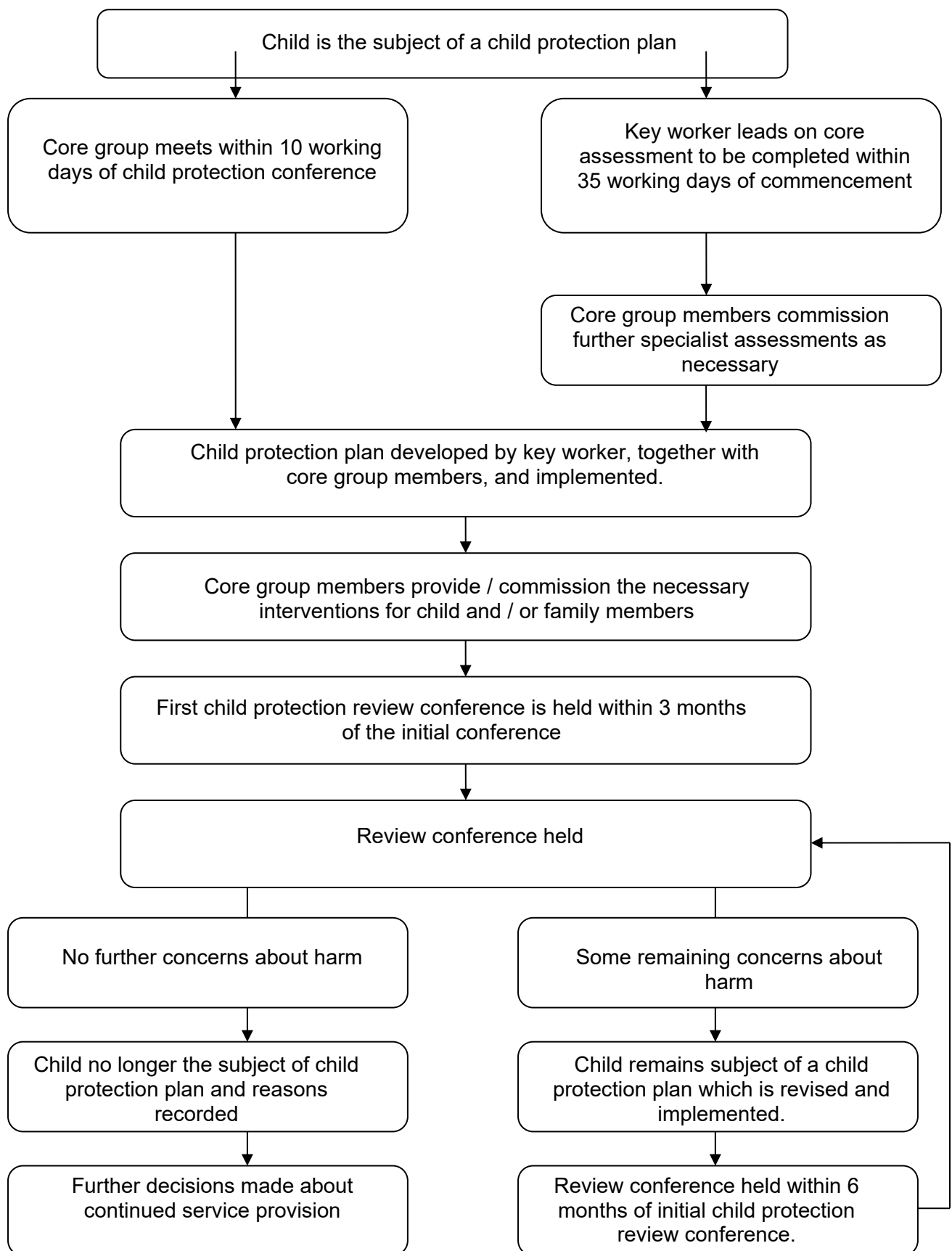
The following flowchart (3) is from “What to do if you’re worried a child is being abused” and shows what happens after a referral to Social Care has led to an “urgent action to safeguard children”.



The following flowchart (4) is from “What to do if you’re worried a child is being abused” and shows what happens after a Strategy Discussion.



The following flowchart (5) is from “What to do if you’re worried a child is being abused” and shows what happens after a Child Protection Conference.



APPENDIX 4

BODY MAP TEMPLATES

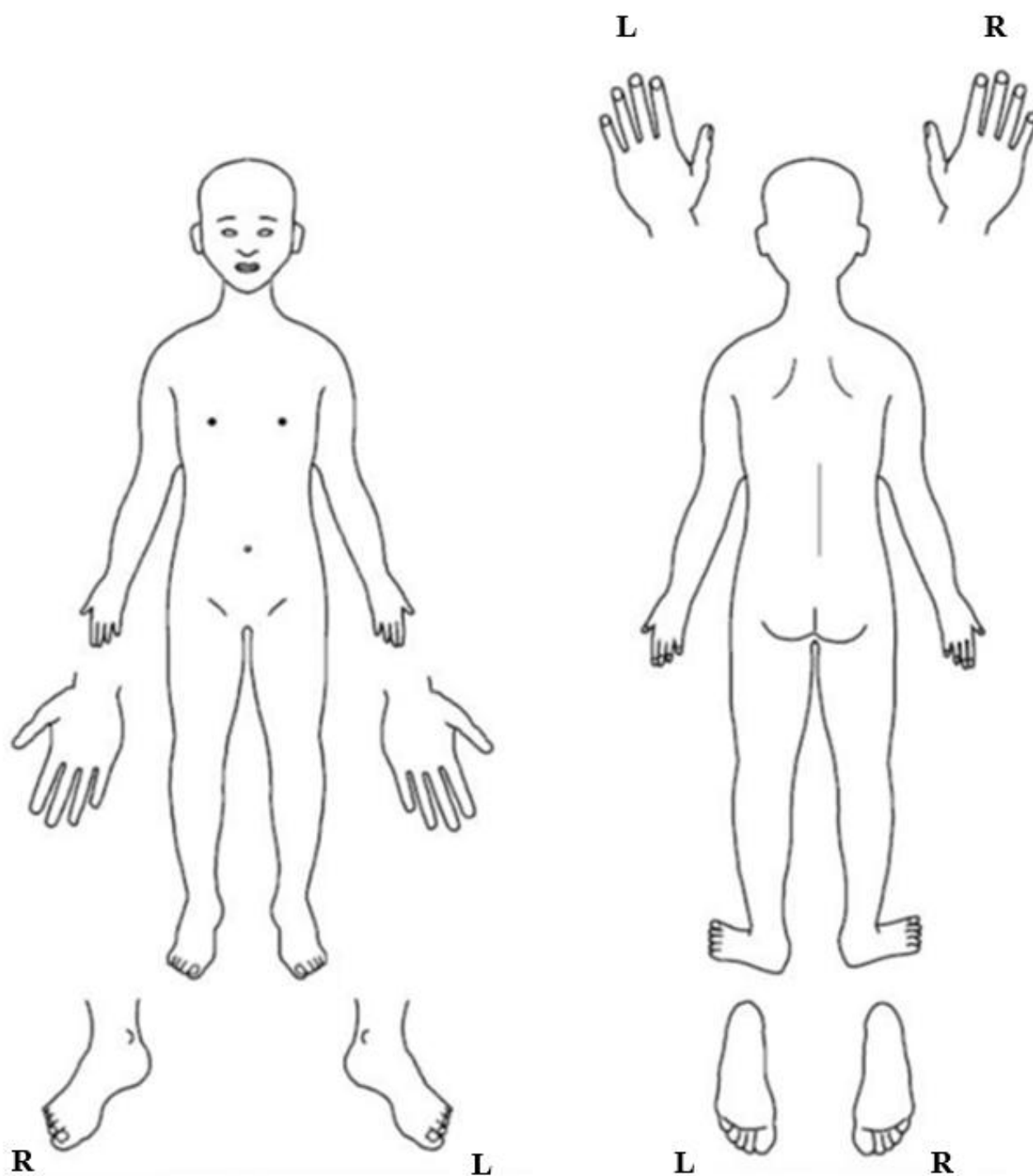
CONFIDENTIAL

CHILD'S NAME:

DATE OF RECORD:

RECORDED BY:

TIME OF RECORD:



APPENDIX 4

BODY MAP TEMPLATES

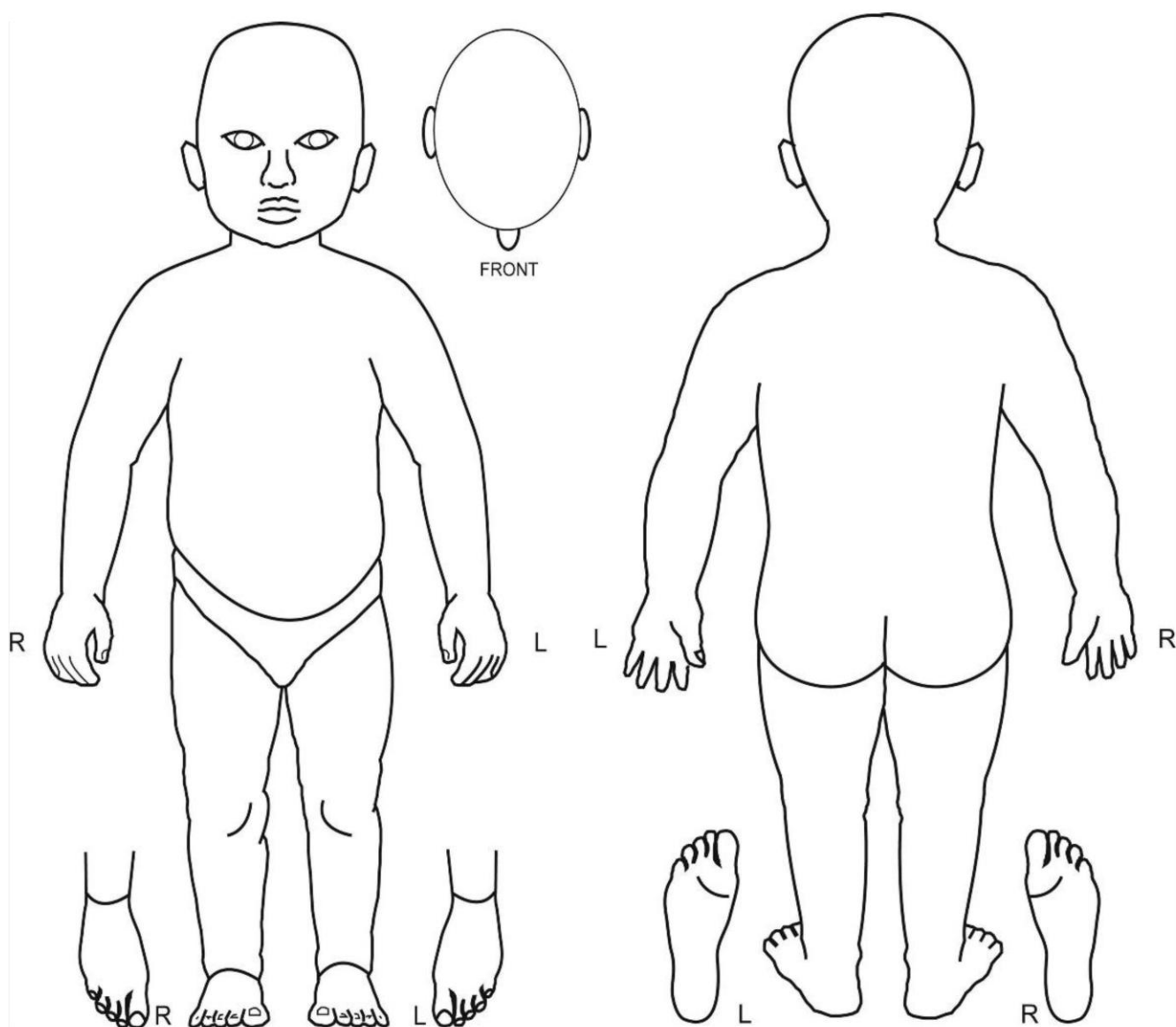
CONFIDENTIAL

CHILD'S NAME:

DATE OF RECORD:

RECORDED BY:

TIME OF RECORD:



APPENDIX 5

ADDENDUM TO THE SAFEGUARDING AND CHILD PROTECTION POLICY IN RESPONSE TO THE COVID-19 PANDEMIC AND ANY FUTURE POTENTIAL SCHOOL CLOSURES

The Department for Education (DfE) previously issued safeguarding guidance to all schools, whether maintained, non-maintained or independent (including academies, academy trusts, free schools and alternative provision academies) in response to the Covid-19 Coronavirus pandemic.

Although it is historical guidance and information, the below will be adopted again in the event of any future temporary school closures under the instruction of the government. A number of important safeguarding principles remain the same.

This will be kept under review and amended accordingly as circumstances and DfE guidance evolves.

1. Designated Safeguarding Leads (DSLs)

- 1.1 The school's Designated Safeguarding Lead and deputies remain the same in the event of a closure/lockdown. Their contact details (published at the front of the policy) also remain the same.
- 1.2 The DSL and deputies remain available and contactable via telephone, email and are able to conduct online audiovisual meetings if necessary.
- 1.3 Where a child (or children) is onsite at the school following prior agreement with the parent/carer, during this period of the national school closures, the DSL or a deputy will also be onsite as normal during those times.
- 1.4 The DSL will continue to monitor their safeguarding inbox as normal.
- 1.5 All staff are aware and have access to the DSL/deputies using the normal methods of communication, which includes email.

2. Reporting safeguarding concerns

- 2.1 All staff will report any concerns they may have to the DSL or a deputy immediately as according to normal procedure. This will primarily be done by email or telephone.
- 2.2 The school and DSL will continue to respond to safeguarding concerns, or allegations against staff, immediately in the same way.

3. Vulnerable children

- 3.1 The school will continue to work with, and liaise with, the local authority who have the key day-to-day responsibility for delivery of children's social care, in relation to any pupils identified to be vulnerable.

- 3.2 The DSL and authorised senior pastoral staff of the school will ensure regular contact with those identified pupils. Senior leaders of the school know best who their most vulnerable children are.
- 3.3 Any concerns will be recorded and reported to the DSL in the normal way immediately. The DSL will liaise with social services and the local authority's virtual school head (VSH) accordingly.
- 3.4 The DSL and SENCO will remain available and continue to liaise with the local authority on any changes relating to identified vulnerable pupils, including looked-after children, or to any education, health and care (EHC) plans.

4. Attendance

- 4.1 According to DfE guidance, during a school closure, the school does not need to complete their usual day-to-day attendance processes to follow up on non-attendance. Where a rota operates, attendance will be recorded as according to DfE requirements.
- 4.2 The school will follow up on any child who does not attend school, where it was specifically identified and agreed with the parent that the particular child will attend school during the closure.
- 4.3 The DfE had introduced a daily online attendance form to keep a record of whether the school is open or not, and if so to record the numbers of children who are attending the school. The school will continue to complete and submit this information accordingly, should this continue to be required/applicable.
- 4.4 The school will also complete any attendance returns to the local authority if necessary.

5. Safer recruitment, staff training and safeguarding induction

- 5.1 If the school recruits new staff, it will continue to follow the relevant safer recruitment processes, including, as appropriate, relevant sections in part 3 of KCSIE. In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact. The school may use a live video link for identity and document checks and use scanned images in advance, as advised, for urgent cases where it is not possible to follow the normal procedure. The applicant must still present the original documents when they first attend their work.
- 5.2 The school will continue to ensure that its staff receive the required safeguarding induction and necessary safeguarding training as normal.
- 5.3 The school will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child.
- 5.4 Similarly, the school will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral' where appropriate. During the COVID-19 period all referrals would be made by authorised management by emailing Misconduct.Teacher@education.gov.uk.

- 5.5 From a safeguarding perspective, the school will continue to ensure it is aware, on any given day, which staff/volunteers will be in the school and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the school/Trust will continue to keep the single central record (SCR) up to date as outlined in KCSIE.

6. Children moving schools and colleges

- 6.1 For looked-after children that changes school during this period, the school's DSL will liaise with the VSH who has responsibility for the child. If the school is the receiving school, the DSL will liaise with the VSH to understand the reason the child is vulnerable and any arrangements in place to support them.
- 6.2 As a minimum the school will, as appropriate, have access to a vulnerable child's EHC plan, child in need plan, child protection plan or, for looked-after children, their personal education plan and know who the child's social worker (and, for looked-after children, who the responsible VSH is). This should ideally happen before a child arrives or, where that is not possible, as soon as reasonably practicable.

7. Mental health

- 7.1 Negative experiences and distressing life events, such as the current circumstances with COVID-19, can affect the mental health of pupils and their parents. Teachers have been made aware of this in setting expectations of pupils' work where they are at home.
- 7.2 Where teachers are providing for children of critical workers and vulnerable children on site, the school continues to ensure that the same support and monitoring, both in-house and through partners, is in place for them.
- 7.3 The DfE, guidance mental health and behaviour in schools, sets out how mental health issues can bring about changes in a young person's behaviour or emotional state which can be displayed in a range of different ways, and that can be an indication of an underlying problem. This is shared with all staff.

8. Children and online safety away from school and college

- 8.1 The starting point for online teaching will be on the same principles as set out in the school's safeguarding policies, including the acceptable use of technologies, social media and staff code of conduct.
- 8.2 All staff have signed the appropriate acceptable use of information technology agreements.
- 8.3 The school will share the recently published guidance from the UK Safer Internet Centre on safe remote learning and from the London Grid for Learning on the use of videos and livestreaming, which helps plan online lessons and/or activities and plan them safely.
- 8.4 The school ensures that any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

- 8.5 Guidance and training is issued by the school to all staff, prior to the staff working from home, on the safe use of all online learning tools that are utilised by the school, expectations on communicating with pupils. All communication is also monitored by the school.
- 8.6 The school has ensured that, as part of the online planning process, children who are being asked to work online have been given very clear reporting routes so they can raise any concerns whilst online – this can be done by directly contacting the DSL or a pastoral manager, phase leader or class teacher. As well as reporting routes back to the school, the following information on age-appropriate practical support has also been signposted in letters (and the website) to pupils and parents:
- Childline - for support.
 - UK Safer Internet Centre - to report and remove harmful online content.
 - CEOP - for advice on making a report about online abuse.
- 8.7 The school continues to ensure that they are in regular contact with parents and carers, providing them with regular guidance materials, other support information and the warning signs to look out for. This is used to reinforce the importance of children being safe online. This includes information on what pupils are being asked to do online, including the secure sites they will be asked to access, and clear information on who from the school their child is going to be interacting with online.