



Westbourne
House School

CHICHESTER

CHILD PROTECTION (SAFEGUARDING) POLICY

This is the policy of Westbourne House School, which incorporates the Prep School, Pre-Prep, Early Years Foundation Stage as well as provision for boarding

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Supporting Policies:

- ***This policy should be read in conjunction with the following:***
 - Behaviour & Discipline Policy
 - Child Missing from Education Policy
 - Data Protection and Privacy Policy
 - E-Safety Policy
 - Employee Handbook
 - First Aid Policy (and associated Protocols)
 - Health & Safety Policy
 - Information Sharing Policy
 - Policy for Pupils with Disabilities, SEN & Learning Difficulties
 - Prep School/Pre-Prep Staff Handbooks (as appropriate)
 - Privacy Notice & Records Management Policy
 - Safer Recruitment Policy
 - Staff Behaviour & Code of Conduct Policy
 - Whistleblowing Policy

Policy Statement

The core purpose of this policy is the safeguarding and promote the welfare of all our pupils, both day and boarding (while they are accommodated at the school), and the guarding and

promoting of their welfare and health – both mental and physical – to create an environment in which pupils feel secure and valued, where they are listened to and taken seriously.

At Westbourne House, we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child and take action to enable all children to have the best outcomes.

Aims

We aim to safeguard and promote the welfare of the pupils at the school with regard to any guidance issued by the Secretary of State, as well as compliance with the government publications: Keeping Children Safe in Education (KCSIE - September 2021), incorporating the additional statutory guidance, Disqualification Under the Childcare Act 2006 (September 2018), What to do if you're worried a child is being abused (March 2015), Working Together to Safeguard Children (September 2018 – updated in 2020 but without changing the date on the published version) which refers to the non-statutory but important advice contained within Information Sharing (July 2018), the Data Protection Act 2018 (please also refer to the Data Protection Policy), Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019, updated September 2021).

In addition, we recognise the Government “Prevent Duty Guidance: for England and Wales” (July 2015, updated April 2021), “The Prevent duty: Departmental advice for schools and child-minders” (June 2015) and “The use of social media for on-line radicalisation (July 2015) part of the Government “CONTEST” anti-terrorism initiative (see Appendix 6), as well as Sexual Violence and Sexual Harassment between Children in Schools and College (May 2018) and National Minimum Standards (NMS) for Boarding Schools (April 2015) and Teacher misconduct: the prohibition of teachers (October 2018). *NB: Copies of these documents are held centrally by the DSL and are available to staff and governors.*

The school has due regard to the non-statutory interim supplement to KCSIE: Safeguarding and remote education during coronavirus (COVID-19), Schools COVID-19 Operational Guidance (August 2021) and Actions for early years and childcare providers during the Coronavirus (COVID-19) outbreak (August 2021) - please refer to appropriate addendums.

As recommended, the policy recognises the need for a designated practitioner to take lead responsibility for safeguarding children within the EYFS (Early Years Foundation Stage) setting and liaising with local statutory children's agencies as appropriate. In accordance with the EYFS Statutory framework, a report is made to Ofsted within 14 days if there is an allegation of serious harm or abuse by any person living, working or looking after children at the premises or elsewhere, or any other abuse on the premises.

The Headmaster, staff and governing body take their responsibility to safeguarding and protect the welfare of children very seriously and work closely with our agencies to ensure

the best standards of care and support. It is clear that safeguarding is everyone's responsibility and that anyone can make a referral to Children's Social Care if they feel such action is required. All staff have an awareness of safeguarding issues as detailed in KCSIE (September 2021) Part 1 and Annex A.

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect and exploitation. Staff are not expected to or be trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by DSL (or a deputy). For any such issue, staff are encouraged to use/complete the school's Concern Form.

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support such a pupil. For example, in cases of domestic abuse (Operation Encompass), the school liaises with the police and social service as required.

The safeguarding and best interests of our pupils are paramount at all times. In instances such as residential trips, we ensure that appropriate suitability checks are made on all adults who will supervise our pupils as part of the risk assessment process.

We follow a rigorous process for Safer Recruitment to safeguard all pupils in the school, as detailed in our Safer Recruitment Policy and by following the guidance as set out in KCSIE (September 2021). All sufficient relevant staff are trained in safer recruitment processes.

Should parents request a copy of the policy it is available on request (via either of the Pre-Prep or Prep School Offices) or on the school website.

Practice and Procedure

At Westbourne House, we follow the statutory framework and adopt the recognised guiding principles.

Statutory Framework

Places a responsibility on all who work with children to contribute to the safety of children and child protection processes (including online safety).

Schools are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a child is in need, or suffering, or is likely to come to significant harm. These procedures should include circumstances where a member of staff is accused or suspected of abuse.

Guiding Principles and Staff Behaviour

- All staff, including new staff, boarding staff, temporary staff and volunteers, are provided with the mandatory induction training that includes:
 - A copy of the school's Child Protection (Safeguarding) Policy
 - A copy of the Staff Behaviour & Code of Conduct Policy
 - A copy of the school's Safeguarding Leaflet
 - A copy of the Behaviour & Discipline Policy (for pupils)
 - A copy of the Children Missing from Education Policy
 - A copy of the E-Safety Policy – which gives details of acceptable use of mobile/smart phones, the internet and use of technology
 - Whistle Blowing Policy (NB: Procedures are also briefly mentioned in Section 3 of the Employee Staff Handbook)
 - The identity and function of the Designated Safeguarding Lead
 - A copy of Annex A of the KCSIE
 - A copy of Part 1 of KCSIE (NB: this is Appendix 10 of Safeguarding Policy) or Annex A if appropriate (and, in effect, Annex B also, for those who work directly with children)
 - These must be read and 'signed off' to confirm that they have been understood (this is done on annual basis or as required);
- Each time KCSIE is updated, this is re-distributed to staff and they acknowledge, by signing, that they have read and understood the contents thereof.
- All staff are alert to the signs of abuse and neglect and know to whom they should report concern or suspicions'
- All staff (including EYFS) are given up to date guidance about conduct and safe practice; and must adhere to the procedures set out in the school's Child Protection (Safeguarding) Policy, the E-Safety Policy and the Staff Behaviour & Code of Conduct Policy, including those in due regard to the use of mobile phones and cameras/videos.
- All staff are made aware that they can make a referral to children's social care if there is a risk of immediate serious harm to a child;
- All staff are aware of the Sexual Offences Act 2003 (2007) Sections 3 & 5 relating to abuse of positions of trust – persons under 18 years receiving education;
- The school has a "Designated Safeguarding Lead (DSL)" with knowledge and skills in recognising and acting upon child protection concerns in both the Prep School and Pre-Prep;
- Within the School there are Deputy DSLs, in both the Prep School and Pre-Prep, trained appropriately;
- The DSL and any deputies are most likely to the complete safeguarding picture and are the most appropriate persons to advise on concerns;
- The DSL is aware of and follows the procedures established by the Local Safeguarding Children Board (LSCB); and the school as a whole in turn use the procedures stated by the LSCB to guide all safeguarding practices;

- The appropriate Head of Year is trained for the role and has the overall responsibility for the welfare and progress of looked-after children; along with support from the DSL and IENCo if/when required;
- The school has a procedure which ensures all staff are aware for handling suspected cases of abuse of pupils, including procedures to be followed where a member of staff is accused of abuse;
- Staff training is reviewed and retraining in the form of INSET takes place regularly (at least annually) using both outside agencies/local authority and in-house training, including new and peripatetic staff induction, including Prevent awareness and how to identify children and young people at risk, on-line safety and the process for Early Help as set out in Working Together to Safeguard Children (February 2019);
- The Headmaster, and all other staff who work with children undertake appropriate training to equip them with the relevant skills and knowledge to carry out their responsibilities for child protection effectively, that is kept up to date by refresher training at 3 yearly intervals, and temporary staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities.
- The DSL and deputies receive appropriate training at least every two years in line with local requirements. These staff are trained in child protection and local inter-agency working to Level 2 / 3, with the advice from the Local Safeguarding Partners (see full contact details below) which includes those on Prevent Awareness, CSE, FGM and how to identify children and young people at risk. In addition to formal training, their knowledge and skills are refreshed at regular intervals, at least annually;
- In addition to the DSL having had Certificated Prevent Training, all staff (including peripatetic staff) and Governors complete on-line Prevent Training.
- The DSL is also trained in e-safety and is aware of the potential for serious child protection/safeguarding issues to arise from:
 - Sharing of personal data
 - Access to illegal/inappropriate materials
 - Inappropriate on-line contact with adults/strangers
 - Potential or actual incidents of grooming
 - Cyber-Bullying
- The school has effective whole school policies on: Anti-Bullying, Use of Reasonable Force, Managing Behaviour, Internet Safety, Managing Allegations and Health & Safety;
- The School educates the children about safeguarding, including peer-on-peer abuse and on-line risks of radicalisation, through various teaching and learning opportunities as part of providing a broad and balanced curriculum eg: whole school focus: 'Safety on Site' (see Curriculum Policy). The children are taught to recognize when they are at risk and how to get help when they need it.;
- The school gives the children opportunities to be listened to and provide early help through tutor meetings, 'Friends', PSHE sessions, Learning4Life, the IENCo, the schools' Independent Listener and The Children's Commissioner (contact details of which are made available at the school telephones);

- Contextual Safeguarding: Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputies) should be considering the context within which such incidents and/or behaviours occur. 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 provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.
- The safety of the children is paramount in all situations. If a child's behaviour endangers the safety of others, the class teacher stops the activity and prevents the child from taking part for the rest of that session;
- If a child threatens, hurts or bullies another pupil, the member of staff records the incident, informs the form tutor and the child is punished. If a child repeatedly acts in a way that disrupts or upsets others, the Deputy Head will contact the child's parents and seek an appointment in order to discuss the situation, with a view to improving the behaviour of the child (further detail of procedures for dealing with abuse by one or more pupils against another pupil can be found in the school's Anti-Bullying & Cyber-Bullying Policy and the Behaviour & Discipline Policy);
- If there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm a referral will be made to local agencies. It would be an expectation that in the event of disclosures about pupil-on-pupil abuse that all children involved, whether perpetrator or victim, are treated as being at risk;
- In accordance with Section 548 of the Education Act 1996 as amended by section 131, School Standards and Framework Act 1998, the school maintains a ban on any form of corporal punishment;
 - Corporal punishment is never used nor is its use ever threatened as this may constitute assault and a crime being committed; the defence of reasonable chastisement is not available to school staff;
 - The school actively discourages the use of corporal punishment by parents on their children for misbehaviour occurring in school;
 - Any reference to giving corporal punishment to a child is to doing anything for the purpose of punishing that child (whether or not there are other reasons for doing it) which, apart from any justification, would constitute battery. However, corporal punishment shall not be taken to be given to a child by virtue of anything done for reasons that include averting:
 - an immediate danger of personal injury to, or
 - an immediate danger to the property of, any person (including the child himself).

Where faith communities use ostracism of families as a way of registering disapproval, the school should minimise the impact of this upon children where they are at school, in terms of their treatment by the school or fellow pupils.

Teachers are allowed to use reasonable force to control or restrain pupils under certain circumstances (Ref: DfE Guidance – Use of Reasonable Force 2011) – see Appendix 5;
We operate safer recruitment procedures (including DBS checks and compliance with Independent School Standards Regulations).

It is incumbent upon the school to ensure that any full, part-time, supply or peripatetic staff are DBS checked prior to employment/engagement including a check to ensure a teacher is not subject to a prohibition order issued by the Secretary of State. This is a whole school requirement and includes all ancillary staff as well as academic teaching staff in-line with KCSIE (see Safer Recruitment Policy);

All new staff receive a Child Protection briefing from one of the school's Designated Safeguarding Leads (DSL) as part of their induction;

Temporary staff and voluntary staff who work with children are made aware of the school's child protection arrangements (see attached a copy of our Safeguarding Leaflet);

All visitors to the School, which includes speakers (who are previously checked as suitable eg: by googling and/or obtaining a reference from another school who has used them previously) are accompanied/supervised at all times throughout their visit. They are expected to report into the School Office (either Prep or Pre-Prep) at which point they will be signed into the Visitor's Book and given a visitor's badge – to be worn at all times whilst on the school site.

- The visitors badge also gives details of the school's fire procedures which are explained whilst signing in.
- All visitors are also made aware of the school's child protection arrangements by way of our Safeguarding leaflet.
- Upon departure, visitors are asked to sign out at the School Office and return their visitor badge.
- Any unknown adults, without a visitors' badge, will be challenged by any member of staff.
- Regular visitors/contractors will receive some basic safeguarding training which will include being introduced to the DSL and given details of the procedures to following in a case of a safeguarding issue.

Any deficiencies or weaknesses in child protection arrangements will be remedied without delay;

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistleblowing Policy;

- A whistleblowing disclosure must be about something that affects the general public such as:

- A criminal offence has been committed, is being committed or is likely to be committed;
- A legal obligation has been breached;
- There has been a miscarriage of justice;
- The health or safety of any individual has been endangered;
- The environment has been damaged;
- Information about any of the above has been concealed.

Governors recognise their responsibility to act in accordance with locally agreed multi-agency safeguarding arrangements and our policy is made available to parents;

The school has arrangements to deal with allegations of abuse against members of staff/volunteers/Headmaster;

The governing body undertakes regular reviews (at least annually) of the school's child protection policies and procedures and of the efficiency with which the related duties have been discharged; this is done by drawing on the expertise of staff and in conjunction with the DSL.

- The school sees these matters as part of its everyday concerns as oppose to an unwelcome bureaucratic requirement

In addition to keeping all our own staff (including governors) trained and updated:

- as of September 2016, Westbourne House facilitates regular (bi-annual) initial and refresher training for DSLs and Deputies for Independent Schools in the local area. This is delivered by Ali Hannant; who also provides training for WSSCB.

With due regard to boarding:

- Arrangements are made to safeguard and promote the welfare of boarders whilst they are accommodated at school; such arrangements have regard to the National Minimum Standards for Boarding Schools (April 2015) and the Children Act 1989 (section 87).
- Briefings are given to senior pupils with positions of responsibility over other pupils, on appropriate action to take should they receive any allegations of abuse.
- The school recognises the need to be vigilant on supervision and monitoring of relationships in boarding and the potential for abuse by peers. When dealing with potential abuse by one or more pupils against another pupil when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' a referral will be made to the local authority as a child protection concern.
- A policy, known to staff and used in practice, for searching for and, if necessary, reporting any boarder missing from school is in place (see Appendix 3).

- The possibility of reporting concerns or allegations to ISI (with telephone number) is made available after having reported any concerns or allegations to local statutory agencies first and foremost.
- Access to boarding houses is restricted throughout the day and access is only permitted under the supervision of houseparents.
- Visitors to the boarding community and accommodation are subject to the same procedure as outlined above for those visiting during the school day.
- If a member of the boarding staff is suspended in circumstances of a child protection nature, alternative accommodation will be provided.
- The school recognizes excessive isolation from families and other external influences; gender imbalance amongst pupils and whether pupils have sufficient free time apart from teaching, preparation and any other school requirements such as prayer are likely to be concerns in considering boarding welfare and acts upon it appropriately.

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparents, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, steps will be taken to verify the relationship of the adults to the child who is being registered.

Role of the Designated Safeguarding Lead (DSL) - as per Annex C of KCSIE September 2021

The Governing Body ensures that an appropriate senior member of the Senior Management Team (SMT) is appointed as the Designated Safeguarding Lead (DSL) for safeguarding and child protection (including online safety). Roger Allingham is appointed to this role and Caroline Oglethorpe (Head of Pre-Prep) acts as his Deputy and takes lead responsibility for safeguarding children within the EYFS setting and the Pre-Prep as a whole. She is trained to the same standard as the DSL and also undertakes the role of the DSL (Roger Allingham) when he is unavailable or off-site.

The DSL takes lead responsibility for safeguarding and child protection (including online safety – as per the school’s E-Safety Policy) at the school. This is explicit in the role holder’s job description.

The DSL is given the appropriate status and authority within the school to carry out the duties of the post which carries a significant level of responsibility. He is given the additional time, funding, training, resources and support need to carry out the role effectively. The additional responsibilities include providing advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Availability of the Designated Safeguarding Lead (DSL)

During term time, the DSL (or a deputy) is always be available, during school hours, for staff to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be available in person in exceptional circumstances availability could be via phone and or Skype or other such media (eg: Zoom). The school and the DSL arrange for adequate and appropriate availability/cover for any out of hours/out of term activities.

The broad areas of responsibility for the DSL (in accordance with Annex C of KCSIE September 2021 and as stated in his personal job description – held on file) is to:

Manage referrals:

- refer cases of suspected abuse and neglect to the local authority children’s social care as required and support staff who make referrals to local authority children’s social care;
- refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required. (NB: NPCC should help understand when to consider calling the police and what to expect when work with the police).

Working with others – the DSL is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the Headmaster to inform him of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, Network Manager, IENCo and the Senior Mental Health Lead Role – who has received suitable training for the role) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- liaise with the Senior Mental Health Lead and the pastoral team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school. This includes:
 - ensure that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintain a culture of high aspirations for this cohort; and,
 - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach the potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact in children’s educational outcomes.

Share Information and Manage Protection Files

The DSL is responsible for ensuring that child protection files are kept up to date, is confidential and stored securely. Concerns and referrals are kept in a separate child protection file for each child and include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

The DSL ensures that these files are only accessed by those who need to see them and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school (including in year transfers) the DSL ensures that, where appropriate, the child protection file is transferred to the new school 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. This is transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt is obtained. Receiving schools should ensure key staff, such as the DSLs, SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the DSL also considers if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. 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 and have that support in place for when the child arrives.

Raising Awareness

The DSL:

- ensures each member of staff has access to, and understands, the school's child protection policies and procedures, especially new and part-time staff;
- ensures the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensures the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- links with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- helps promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children who have or have had a social worker are experiencing with teachers and the school's leadership staff.

Training:

The DSL (and deputies) undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years and the DSL should also undertake Prevent awareness training. Training should provide the DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put

children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements (full details in Chapter 1 of Working Together to Safeguard Children);
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers (as in Section 17 of the Children Act 1989);
- understand the importance of information sharing, both within the school and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training, the DSL's knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training supports the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes:

- ensuring that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, the DSL is supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE September 2021, and therefore the DSL is equipped to:

- understand the importance of information sharing, both within the school and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Multi-working

The school has a pivotal role to play in multi-agency safeguarding arrangements. The Governing body ensures that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children (February 2019).

It is especially important that the school understands its role in the new safeguarding partner arrangements.

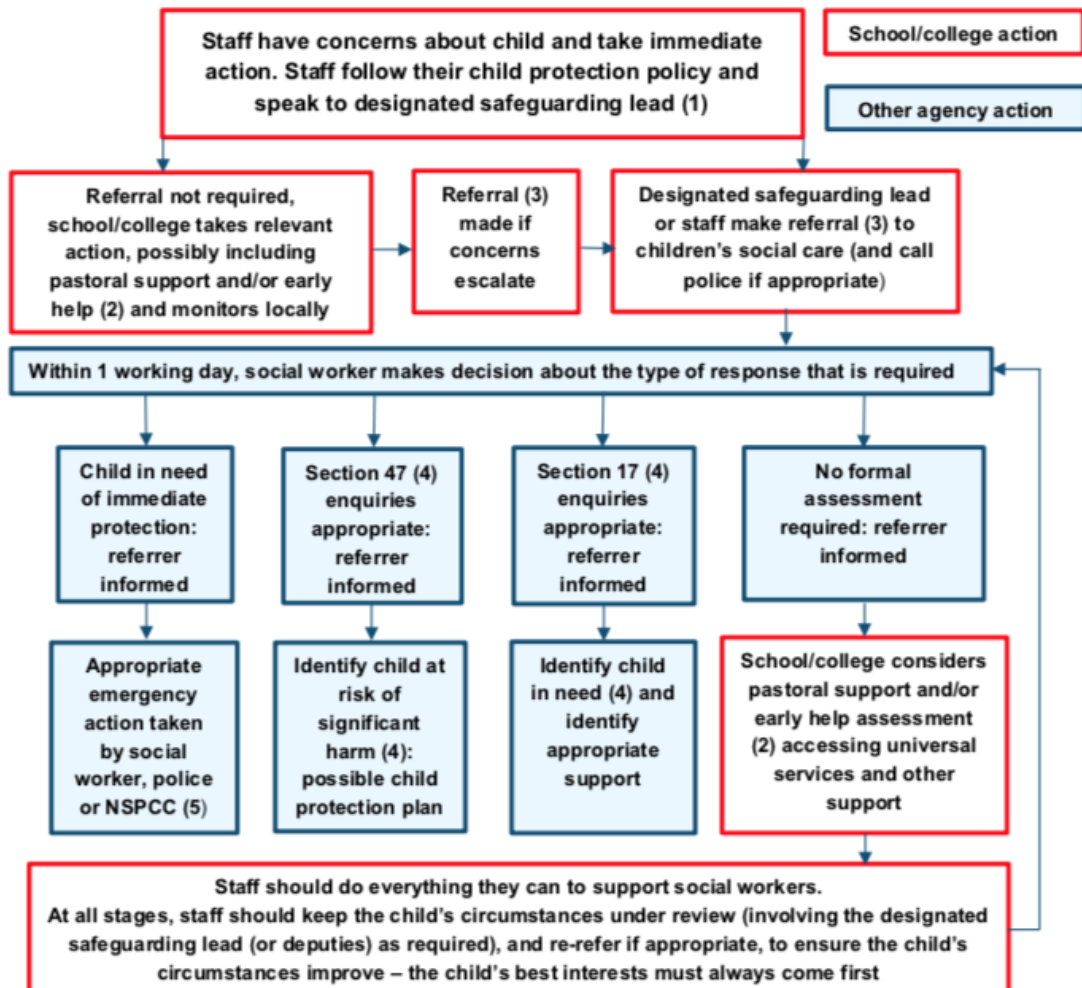
The school works with social care, the police, health services (the three safeguarding partners) and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. The school allows access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

It is expected that, locally, the three safeguarding partners may name the school as a relevant agency in order to reach a conclusion on how best to achieve the active engagement of individual institutions in a meaningful way. If named as a relevant agency the school, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements.

Specifically, guidance for staff who have concerns that a child may be in need:

- Any member of staff concerned about a child must inform the DSL immediately. He/she will inform the Headmaster (and Headmaster of Pre-Prep if appropriate). Staff should consider and make reference to the document Information Sharing July 2018 and follow the seven golden rules as set out in the guidance.
- The member of staff must record factual information regarding their concerns on the same day. The record must be a clear, concise and factual account of the observations. These should be signed and dated.
- The DSL, in consultation with the Headmaster, will communicate readily with a local safeguarding agency whenever an allegation or disclosure of abuse has been made. Contact will be made within 24 hours of a disclosure or suspicion of abuse. If there is a risk of immediate serious harm to a child, a referral will be made to Children's Social Care and / or the Police immediately and all allegations will be reported to the LADO immediately and within one working day at the latest.
- When a referral is made to Social Services, the DSL will ensure that a written report of the concerns is forwarded.
- Particular attention will be paid to the attendance and development of any child identified as a child in need, or a child who is suffering or likely to suffer significant harm.
- If a child, identified by Children's Social Care Services as being in need of a Child Protection Plan changes school, the Social Services department will be informed and the appropriate records will be transferred to the receiving school.
- The School differentiates between the safeguarding of children who have suffered or are likely to suffer significant harm and those who are in need of additional support from one or more agencies. The former reporting to Children's Social Care; the latter using local inter-agency assessment processes (CAF and TAC).

Actions where there are concerns about a child



1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of KCSIE September 2021 – Part One.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter 1 of Working Together to Safeguarding Children provides details guidance on the early help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter 1 of Working Together to Safeguarding Children
4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act

1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter One of Working Together to Safeguard Children.

- *Section 17 Definition:* A **child in need** is **defined** under the **Children Act 1989** as a **child** who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a **child** who is disabled.
- *Section 47 Definition:* the Children's Social Care must carry out an investigation when they **have** 'reasonable cause to suspect that a **child** who lives, or is found, in their area is suffering, or is likely to suffer, significant harm'.

5. This could include applying for an Emergency Protection Order (EPO).

Recognising Child Abuse – When to be concerned

It is important that all members of staff including visiting staff both paid and unpaid should be aware and alert to possible outward signs of abuse or neglect (see Appendix 1). These signs may include one or more of the following:

- An injury that is not typical of the bumps and scrapes associated with everyday activities, or an injury that is not consistent with any explanation given.
- Frequent injuries even when apparently reasonable explanations are given.
- Sudden changes in behaviour, performance or attitude.
- Anxiety or low self-esteem.
- Knowledge of sexual matters beyond what would normally be expected, or sexual behaviour that is unusually explicit or inappropriate to the child's age.
- Disclosure of an experience in which the child may have been significantly harmed.
- In due regard to FGM, please also refer to:
 - Appendix 1 – Definitions of Abuse, Neglect and Safeguarding Issues

Dealing with a disclosure

- Listen to what is being said without displaying shock or disbelief.
- Accept what is being said.
- Allow the child to talk freely.
- Reassure the child, but do not make promises which it might be impossible to keep.
- Do not promise confidentiality, as it might be necessary to refer the case to Social Services.
- It is not a requirement to seek parental or pupil consent for a referral to statutory agencies/LADO.
- Reassure the child that what has happened is not their fault and stress that it was right to talk.
- Listen rather than ask direct questions; ask open rather than leading questions.

- Explain what has to be done next and who has to be told.
- When dealing with abuse by one or more pupils against another pupil (peer-on-peer abuse) when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' a referral will be made to the local authority as a child protection concern.
- In due regarding to sexting; *although the pupils are not allowed mobile phones in school* (and in addition to the guidance above):
 - A disclosure should be reported to the DSL.
 - Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.
 - If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
 - Do not delete the imagery or ask the young person to delete it.
 - Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL .
 - Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
 - Do not say or do anything to blame or shame any young people involved.
 - Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.
 - The DSL should hold an initial review meeting with appropriate school staff
 - There should be subsequent interviews with the young people involved (if appropriate)
 - Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
 - At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

Assessment and Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. Concerns and referrals are stored securely in a separate child protection file for each child (as appropriate).

Records should include:

- Contemporaneous notes: make handwritten notes as soon as possible after the conversation, ensuring that they are a clear and comprehensive summary.
- Do not destroy the original notes in case they are needed by a court.

- Record the date, time place and any noticeable non-verbal behaviour and the words used by the child.
- To make observation of an injury, a diagram is incorporated into the Safeguarding Report form to show the position of such injury, however, staff must only view parts of a child's body which are normally visible.
- Record statements and observations, not interpretations or assumptions.
- Details of how the concern was followed up and resolved, along with a note of any action taken, decisions reached and the outcome
- A recognised pro-forma is available to all staff for recording concerns, to be given to the DSL (blank pro-formas are held in the Pre-Prep and Prep School Staffrooms)
 - As of January 2022, all concerns should be reported via the school's online safeguarding tool: CPOMS.
- Low level concerns that do not reach the LCSB thresholds are recorded on the 'concerns' form and filed with the DSL (please also refer to Appendix 9 – Low-Level Concerns Procedure).

Staffing and Resources

In line with KCSIE 2021, Annex C: Roger Allingham is the appointed Designated Safeguarding Lead (DSL) for Child Protection (as well as being a Maths teacher). Caroline Oglethorpe (Head of Pre-Prep) acts as Deputy DSL and takes lead responsibility for safeguarding children within the EYFS setting and the Pre-Prep as a whole. Both of these members of staff are on the Senior Management Team (SMT) and have the status and authority to carry out the duties of the post; they are given the time, funding, training, resources and support to provide advise/support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings and/or support other staff to do so, and to contribute to the assessment of children.

The DSL also has the responsibility to maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of policies and procedures in practice.

In the case of absence from School, both Peter Fisher (Deputy Head & Head of Boarding) and Jo Rich (Year 1 Teacher) have the appropriate higher-level Safeguarding training to enable them to cover any safeguarding issues both in the Prep School and Pre-Prep (including EYFS).

In addition to the above, the following staff have been trained in Level 2-3 Safeguarding and act as deputies as the need arises:

- Clare Smith (Houseparent)
- Sam Pollock (Senior Mistress)
- Vicky Eismark (PA to Headmaster)

Termly meetings with the DSL take place to update Deputy DSLs on safeguarding issues and procedures and at which they also have the opportunity to contribute to the writing of this policy.

A member of our governing body is designated to take a lead in relation to responsibility for our safeguarding arrangements. Mr James Passam currently takes this role. However, the safeguarding duties remain the responsibility of the Governing Body as a whole, including the annual review of safeguarding. The LCSB no longer audits on-line; the School now uses the NSPCC Audit.

Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL and will not be delegated.

Allegations involving teachers and other staff

We recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff.

The guidance in KCSIE (Part Four) is followed where it is alleged that anyone working in the school, that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

Any allegations against staff, volunteers or the DSL with responsibility for safeguarding must be reported to the LADO (for advice at the very least), as well as being reported to the Headmaster, so as to enable a resolution, as fast as reasonably possible, which will benefit all concerned. The DSL may be consulted by the Headmaster (unless he is the object of the allegation), since the DSL will have received higher level safeguarding training.

If the Headmaster is absent, the allegation should be passed to the Chair of Governors. If the allegation concerns the Headmaster, the person receiving the allegation should immediately inform the Chair of Governors without notifying the Headmaster first. In case of serious harm, the police should be informed from the outset.

If a child or parent makes an allegation of abuse against another member of staff, the person receiving the complaint must take it seriously and immediately inform the Headmaster or Head of Pre-Prep.

Any member of staff who has reason to suspect that a child may have been abused by another member of staff, either at school or elsewhere, must immediately inform the Headmaster. A record of the concerns must be made, including a note of any witness to the incident or allegation.

Following an allegation or disclosure, all unnecessary delays will be eradicated. An investigation will not be undertaken without prior consultation and instruction to do so from the Local Authority Designated Officer (LADO). The Headmaster and DSL will not make their own decision over what appears to be borderline cases but rather the doubts and concerns will be discussed with the LADO. The LADO will provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in the school. Where and when appropriate, the DSL will have informal discussions with the LADO to decide appropriate courses of action.

If the Headmaster decides this is justified, he must make the referral directly to the local Social Services Department. If the allegation constitutes a serious criminal offence, it will be necessary to contact Social Services before informing the member of staff involved.

If it is decided that it is not necessary to refer to the LADO, the Headmaster will consider whether there needs to be an internal investigation. We recognise fully that we have a duty of care towards all of our staff, and we will always:

- Keep an open mind until a conclusion has been reached
- Keep him or her informed of progress of the investigation
- Interview a member of staff before any further action is taken

Any member of staff invited to a meeting whose outcome is likely to result in his or her suspension, is entitled to be accompanied by a friend or Trade Union representative. Suspension of a member of staff is a neutral act and does not imply that any judgement has been reached about his or her conduct.

However, it is a serious step and with legal advice we will normally only suspend a member of staff where there is serious risk of harm (or further harm) to the child; where allegations are so serious as to constitute grounds for dismissal, if proved; and if the police are investigating allegations of criminal misconduct.

In the event of suspension, staff living in school accommodation will be required to remain off-site for the duration of their suspension. We will always consider whether an alternative to suspension might be appropriate. Possibilities include:

- Sending the member of staff on leave
- Giving him or her non-contact duties
- Ensuring that a second adult is always present in the classroom when he or she teaches

In the event of an allegation against the Headmaster, this should be reported to the Chair of Governors who will in turn seek advice and instruction from the LADO. (NB: all parents have

access to the Chair of Governors through a confidential route). Subsequent investigation and all action will be carried out by the Chair of Governors (see Appendix 2).

The school undertakes to promptly report to the Disclosure and Barring Service (DBS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child. The School recognises the need to respond to requests from the DBS for information held and would consider making a referral to the Teaching Regulation Agency (TRA) – an executive agency of the Department for Education. Where a teacher has been dismissed a prohibition order may also be appropriate.

The circumstances where the School would cease to use a person's services include: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

The school is aware that it has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of an enquiry. All records will be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer. The school sees these matters as part of its everyday concerns rather than an unwelcomed bureaucratic requirement.

Disqualification from working in childcare

For staff who work in early and later years childcare, including before and after school clubs, for children who have not attained the age of 8, or who are directly concerned with the management of such provision, the school must ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009. Staff are required to notify the school immediately if there are any reasons why they should not be working with children.

Guidelines for Staff (Ref: Guidance for Safer Working Practice for Adults who work in Education April 2020).

This guidance is issued within this policy for the protection of both staff and pupils. In education, all relationships are founded on trust. It is vital for those in positions of trust to understand the power this gives them over those in their care, and the responsibility they must exercise as a consequence.

- Do not let suspicion, disclosure or allegations of abuse go unreported or unrecorded.
- Do provide access for pupils to talk to you about any concerns they may have
- Plan activities that involve more than one other person being present, or are at least within sight or hearing of others.

- If it is necessary to speak to a child alone, always inform another member of staff where you are. It is advisable not to close the door of the room, or to use a room with a glass-viewing panel in the door.
- Without compromising confidentiality, consider whether it is advisable to inform the child's tutor/year coordinator of the conversation.
- Recognise that caution is required in sensitive moments of counselling on matters such as bullying, bereavement or abuse.
- On residential trips, pupils and staff must have separate sleeping accommodation.
- Avoid situations that compromise your relationship with pupils and are unacceptable within a relationship of trust.
- During coaching of sport or instrumental teaching, where a degree of physical contact may be inevitable, staff must be particularly aware that this should only be used to develop skills/techniques or to treat or prevent injury.
- Staff are advised to avoid transporting a single child in a vehicle.
- Remember that someone else may misinterpret your actions, no matter how well intentioned.
- Do not have inappropriate physical or verbal contact with pupils. Avoid suggestive remarks or gestures, even in fun.
- Do not jump to conclusions about others without checking the facts.
- Do not rely on your good name to protect you.
- **Do not believe "it could never happen to me".**

School Contact Telephone Numbers:

- Roger Allingham (DSL) – 07736 544062
- Caroline Oglethorpe (DSL for Child Protection in Pre-Prep/EYFS) – 07789 072699
- Martin Barker (Headmaster) – 07709 155460
- Peter Fisher (Deputy Head & Head of Boarding) – 07966 705354
- Christopher Keville (Chairman of Governors) – 07799 727122
- James Passam (Governor Responsible for Safeguarding) – 07843 557952
- Vicky Eismark (PA to Headmaster & Deputy DSL) – 077885 77794
- Reverend Ian Forrester (Independent Listener) – 01243 774045
- Mrs Anne Geffen (Independent Listener) – 01243 532026

Contact Details for our Local Safeguarding Partners - West Sussex Safeguarding Children Partnership:

- **West Sussex County Council Multi Agency Safeguarding Hub (MASH)/LADO Service:**
 - 01403 229900 (see further details below)
- **West Sussex Safeguarding Children Partnership:**
 - 0330 222 7799 4108
 - wsscplscb@westsussex.gov.uk

- **WSSC LADO:**

- Miriam Williams
- Donna Tomlinson
- Sally Arbuckle (Assistant) – Mob: 07710 965209
 - Phone: 0330 222 6450
 - Email: LADO@westsussex.gov.uk

WSSC Safeguarding in Education Enquiries Line:

- 0330 222 4030

WSSC Safeguarding in Education Manager:

- Jez Prior – 0330 222 7618 / Mobile: 07850 537364
 - Email: jez.prior@westsussex.gov.uk

Sussex Police:

- 0845 60 70 999

Designated Nurse Safeguarding Children (West Sussex):

- 07770 800 247

Contact Details for National Safeguarding Children Organisations:

- The Children’s Commissioner – 0800 528 0731
- Concerns about the welfare of a child can be reported through to a single country-wide phone number, known as ‘**MASH**’:
 - 01403 229900 – Monday to Friday between 9am-5pm
 - At all other times, including nights, weekends and Bank Holidays, an Out of Hours Emergency Team can be contacted: 0330 222 6664
 - Email: mash@westsussex.gov.uk
- Police – 101 and ask for the Safeguarding Investigations Unit, alternatively in an emergency dial 999
- ISI – 020 7710 9902
- Child Line – 0800 1111
- NSPCC – 0808 800 5000 (NB: also runs a Whistleblowing helpline on behalf of the Government on the same telephone number)
- Public Concern at Work (Whistleblowing) – 0207 404 6609
- In the case of FGM, it is mandatory for staff to report such cases to the DSL or Deputy and the police (details above).
- In the case of extremism, any concerns should be addressed to the DfE dedicated helpline: 020 7340 7264 (counter-extremism@education.gov.uk)

Appendix 1 – Definitions of Abuse, Neglect & Safeguarding Issues (including peer-on-peer abuse)

In line with KCSIE September 2021 – Part 1:

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. For additional support, staff are encouraged to refer to KCSIE September 2021 – Part 1 where, if accessed electronically, links are available.

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

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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.

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

commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer-on-peer abuse) in education and **all** staff should be aware of it and of their school's policy and procedures for dealing with it,

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

Safeguarding issues

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal – whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.

Other safeguarding issues all staff should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

Child Criminal Exploitation (CCE)

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced

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

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however 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.

Child Sexual Exploitation (CSE)

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

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

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

Female Genital Mutilation (FGM)

Whilst **all** staff should speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police.

Mental Health

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

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

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and

into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the *mental health and behaviour in schools guidance*. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

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

Peer-on-peer abuse (child on child)

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports, as well as recognising the children are capable of abusing their peers (including online).

As set out in Part One of KCSIE September 2021, all staff should understand, that even if there are no reports in the schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding peer-on-peer abuse they should speak to their DSL (or deputy); all staff working with children are advised to maintain an attitude of **'it could happen here'**.

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

Peer-on-peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should be clear as to the school's policy and procedures with regard to peer-on-peer 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 (please also refer to Appendix 8).

Serious violence

All staff should be aware of the indicators, which may signal 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 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 and having been involved in offending, such as theft or robbery. Advice for schools is provided in the Home Office's *Preventing youth violence and gang involvement* and its *Criminal exploitation of children and vulnerable adults: county lines* guidance.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL (and deputies) should be considering the context within which such incidents and/or behaviours occur. 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 provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional

information regarding contextual safeguarding is available from contextualsafeguarding.org.uk

In line with KCSIE September 2021– Annex A:

The points below contain important additional information about specific forms of abuse and safeguarding issues. If staff have any concerns about a child's welfare, they should act on them immediately. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

Staff should also have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. Any concerns about a child's welfare should be acted upon immediately; following the procedures as set out in this policy.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org

Children and the court system

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

- <http://formfinder.hmctsformfinder.justice.gov.uk/ywp-5-11-eng.pdf>
- <http://formfinder.hmctsformfinder.justice.gov.uk/ywp-12-17-eng.pdf>

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

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

- <https://helpwithchildarrangements.service.justice.gov.uk/>

Children missing from education (*please also refer to separate policy*)

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

In response to the guidance in KCSIE 2021, the school has:

- Staff who understand what to do when children do not attend regularly;
- Appropriate policies and procedures are in place for pupils who go missing from education;
- Staff who knows the signs and triggers for travelling to conflict zone, FGM, 'honour'-based abuse and forced marriage;
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - Leave school to be home educated
 - Move away from the school's location/local area
 - Remain medically unfit beyond compulsory school age
 - Are in custody for four months or more (and will not return to school afterwards); or
 - Are permanently excluded.

The school will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO, (<https://www.nicco.org.uk/>) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: *Child sexual exploitation: guide for practitioners*

County lines

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 schools (mainstream and special), 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 CSE and CCE 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 and are subsequently found in areas away from their home;
- have been the victim or 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.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery and the National Referral Mechanism

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children’s

social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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

- NSPCC - UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, 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 factsheet: Homeless Reduction Act summarises the new duties. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school 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 social care will be the lead agency for

these children and the DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17-year olds who may be homeless and/or require accommodation.

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

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

Actions

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

FGM

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

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

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

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage> School and staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to

intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL(or deputy) making a Prevent referral.

The school's DSL (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). DSLs and other senior leaders in schools should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The DSL should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#).

Additional support

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

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

Peer-on-peer/ child on child abuse

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It **can** happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports. This **can** include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and

non-consensual sharing of nude and semi-nude images and/or videos; 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 and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Sexual violence and sexual harassment between children in schools and colleges

Context

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

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

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

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

Staff should be aware of the importance of:

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

What is sexual violence and sexual harassment?

Sexual violence

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

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

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

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

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

What is consent?²⁵ Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found at Rape Crisis England & Wales - Sexual consent

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: consensual and non-consensual sharing of nude and semi-nude images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
 - sharing of unwanted explicit content;
 - upskirting (is a criminal offence³⁰);
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;
 - sexual exploitation; coercion and threats.

Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 of KCSIE 2021 – Part One. As is always the case, if staff are in any doubt as to what to do they should speak to the DSL (or a deputy).

Appendix 2 – The Responsibilities of the Governing Body

The Governing body is accountable for ensuring the School has effective policies and procedures in place in accordance with this guidance, and monitoring the school's compliance with them. The Governing Body is aware that among other obligations, the Data Protection Act 2018 and GDPR place duties on organisations and individuals to process personal information fairly and lawfully and keep the information they hold safe and secure (please refer to Data Protection Policy).

The Data Protection Act 2018 and GDPR do not prevent, or limit, 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 promote the welfare and protect the safety of children (please also refer to the school's Information sharing Policy).

Neither the Governing body, nor individual governors, has a role in dealing with individual cases or a right to know details of cases (except when exercising their disciplinary functions in respect of allegations against a member of staff). There is however a governor who has specific responsibility for child protection who meets with the DSL three times a year; these meetings are minuted.

In order to achieve this responsibility, Governors are supplied with appropriate information that enables them to monitor compliance with the requirements of KCSIE September 2021. Governors receive appropriate training so as to be equipped with the knowledge to fulfil their functions.

The Governing Body ensures that the school:

- Has a Child Protection Policy and procedures in place that are in accordance with LA guidance and locally agreed multi-agency safeguarding arrangements, and the policy is made available to parents via the school's website.
- Has sufficient relevant staff trained in safer recruitment processes.
- Operates safer recruitment processes and makes sure that all appropriate checks are carried out on new staff and volunteers who will work with children, including DBS Checks and Barred List Checks.
- Has procedures for dealing with allegations of abuse against members of staff and volunteers that comply with guidance from the LADO/West Sussex Safeguarding Children Board and locally agreed multi-agency safeguarding arrangements.
- understands the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners.
- Has a senior member of the school's staff who is designated to take lead responsibility for dealing with child protection issues, providing advice and support to other staff, liaising with the LADO/West Sussex Safeguarding Children Board, and working with

other agencies. The DSL need not be a teacher but must have the status and authority within the school management structure to carry out the duties of the post including committing resources to child protection matters, and where appropriate directing other staff.

- Has a Deputy DSL to act in the DSL's absence.
- Has in place appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.
 - Where reasonably possible, schools should hold more than one emergency contact number for each pupil or student. This goes beyond the legal minimum and is good practice to give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.
- In addition to basic child protection training, the DSL undertakes training in inter-agency working, Threshold Training, MASH and CSE, that is provided by, or to standards agreed by, the LSCB, and refresher training at 2 yearly intervals to keep his/her knowledge and skills up to date.
- The Headmaster, and all other staff who work with children undertake appropriate training to equip them to carry out their responsibilities for child protection effectively, that is kept up to date by refresher training at 3 yearly intervals, and temporary staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities.
- The governing body remedies any deficiencies or weaknesses in regard to child protection arrangements that are brought to its attention without delay.
- The Chair is responsible for liaising with the LA/West Sussex Safeguarding Children Board and/or partner agencies, as appropriate in the event of allegations of abuse being made against the Headmaster.
- The Governing Body reviews the school's Child Protection (Safeguarding) Policy and its procedures annually as part of their duty of care to health, safety and welfare of all pupils at the school.
- Alongside this, the governors receive a termly Safeguarding Report from the DSL and undertake to rectify any weaknesses without delay.

The Governing Body also ensures that the schools Child Protection Policy includes:

- procedures to minimise the risk of peer-on-peer abuse;
- how allegations of peer-on-peer abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other child affected by peer-on-peer abuse will be supported;
- a clear statement that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up";

- recognition of the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer-on-peer abuse is unacceptable and will be taken seriously; and
- the different forms peer-on-peer abuse can take, such as:
 - sexual violence and sexual harassment. Part five of KCSIE sets out how schools and colleges should respond to reports of sexual violence and sexual harassment;
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexting (also known as youth produced sexual imagery): the policy should include the school's or college's approach to it. The department provides Searching Screening and Confiscation Advice for schools. The UK Council for Child Internet Safety (UKCCIS) Education Group has published Advice for Schools and Colleges on Responding to Sexting Incidents; and initiation/hazing type violence and rituals.

A member of our governing body is designated to take a lead in relation to responsibility for our safeguarding arrangements. Mr James Passam currently takes this role. However, the safeguarding duties remain the responsibility of the Governing Body as a whole, including the annual review of safeguarding. This review is undertaken on-line with the NSPCC Audit tool.

Appendix 3 – Lost Child Procedure

In order to minimise the possibility of a child getting lost, all staff need to be vigilant in maintaining a check on the number of children in their care. This means that in addition to the statutory keeping of attendance registers, head counts after break times and at the beginning of lessons should automatically take place. The practice will ensure that if a child should go missing, the loss is quickly discovered.

With due regard to boarding:

- Registers are taken by the staff on duty at the start of boarding time (5.30pm in the Library) and then again at the start of all evening meals. On Wednesday afternoons, a register is also taken after games before boarders' free time.
 - The electronic diary and school register is referred to (a daily paper copy of which is put on the Notice Board in the Staff Room) to account for any boarders not registered.
- A 'signing out' system is used for all boarding children and a 'signing in' system is also completed on arrival at an outhouse (for Year 7&8 pupils). Duty staff and house parents communicate regarding any anomalies to ensure that all children are accounted for both in the Main House and outhouses.

In the event of a missing child, the loss should be immediately reported to the Headmaster or a senior member of staff who will then direct the course of action.

This will include any or all of the following:

- Alert other members of staff and deploy appropriately whilst maintaining adequate supervision of the remaining children.
- Question children.
- Conduct thorough search of the buildings and outdoor area.
- If the child has not been found within 15 minutes, parents should be contacted and possibly also the police.
- Continue to search involving as many adults as possible, opening up the area and keeping in touch by mobile telephone.

On finding a missing child:

- Alert the Headmaster or the senior member of staff involved.
- Inform all other persons who were deployed to help search.
- The child should be taken to a safe and appropriate place to discuss with the Headmaster/a senior member of staff the reasons for their actions.
- In a disciplinary situation, the schools' Behaviour and Discipline Policy would be followed, including communication with parents by the Headmaster.

- In an emotionally driven situation, the child would be counselled and supported in a safe and appropriate place by member of staff known and familiar with the individual (tutor, boarding staff, matron, IENCO etc.). Communication with parents by the Headmaster would follow.
- In the situation where a child is found by the police or outside agencies the Headmaster or senior member of staff would keep in constant communication and follow their advice regarding further action.
- Written records of all missing child incidents are made by the Headmaster or senior member of staff and kept within confidential pupil files. All staff would be made aware of a situation.

Appendix 4 – Late Collection Procedure

If a child is not collected at the end of the school day, the child remains the responsibility of the class teacher or assistant until alternative arrangements have been made.

Each instance is different and staff need to act on initiative but the following procedure is likely to be “best practice”.

- Allow a 10-minute leeway for normal delay or lateness.
- After 10 to 15 minutes, call parents or “collecting person”. Should there be no response, refer to emergency contacts.
- Responsibility for the child may be passed onto the “Childcare” staff or to a colleague if necessary or appropriate. In the Prep School pupils in Y5 and above should be sent to the Library (where Day Pupil Prep is held), to be collected at the end of the session.
- The child should not be left alone and should be reassured that the situation will be resolved.
- Under no circumstances should a child be allowed to go with another parent without consent from the child’s own parent or from the Headmaster.
- The Headmaster of the Pre-Prep or the Headmaster in the Prep School should be kept informed of the situation.
- In situations where it is not possible to contact parents/carers, the Headmaster/Headmaster of Pre-Prep will contact Children’s Social Care Services 60 minutes after the finishing time of the pupil (also taking account After School Activities, which run for approximately 60 minutes after the pupil’s finishing time):
 - Pre-Prep (including EYFS): 3.15pm
 - Junior Department (Years 3&4): 4.30pm
 - Years 5-8: 5.30pm

Late Collection from After School Activities

Those in charge of after school activities have a responsibility to ensure that the pupils in their care are safely collected at the end of the session. In the event of a child not being collected, the “activity leader” will stay with the child for 10 to 15 minutes to allow for normal delay or lateness. After this time, the activity leader will contact the Pre-Prep and/or the Prep School as appropriate. A member of staff will then take responsibility and follow the late collection procedure.

Appendix 5 – Restraint of Pupils Procedure (Ref: Government Guidance “Use of Reasonable Force - July 2013”)

What is physical restraint?

Restraint occurs whenever a member of staff, using intentional force, physically restricts a child’s movement against his or her will.

Physical restraint does not include the use of gentle physical prompting or guidance where the child is happy to comply and the aim is to assist him or her to participate appropriately in activities. There are other situations where physical contact may be necessary eg demonstrating exercises in PE lessons; administering first aid; or offering comfort to a distressed pupil. This does not constitute restraint but staff should be conscious of pupil perceptions and recognise that for some pupils touching may be unwelcome and misinterpreted despite good intentions.

Physical restraint is a procedure for dealing with an unsafe or crisis situation.

It must not be used as a form of punishment and must not be used when a less severe response might have effectively resolved the situation. Deliberate use of physical contact to punish a pupil, cause pain or injury or humiliation is unlawful, regardless of the severity of the pupil’s behaviour or the degree of provocation (Ref: Working Together to Safeguard Children - February 2019).

The use of physical restraint

Restraint should only be used in circumstances where there are good grounds for believing that the pupil is placing him/herself or other people in immediate danger or where there is a likelihood of significant damage to property. (As outlined in the 1996 Education Act, 550A Sec. 93 Education & Inspections Act 2006 and Use of Reasonable Force 2013). Restraint should be used rarely to secure compliance with staff instructions; other methods should always be considered first.

If we are aware that a pupil is likely to behave in a way that may require physical restraint, it will be sensible to plan how to respond, should such a situation arise. This plan should be shared with parents and other staff taking account of the school policy and legislation. If physical restraint is likely to be necessary this should be included in the pupil’s Additional Learning Plan (ALP) together with information on: de-escalation strategies; the manner in which the pupil will be held; how support can be summoned if needed; any medical factors to be considered.

Types of Restraint

Restraint occurs whenever a member of staff, using intentional force, physically restricts a pupil’s movement against the pupil’s will. This may mean restraining a pupil or moving him/her by physical means. The procedures of restraints apply to pupils of either sex and of any age.

Restraint can be:

- Partial, restricting and preventing particular movements.
- Total as in the case of immobilization.

Partial restraint covers a wide range of techniques which can be applied in degrees to meet particular circumstances. It may involve:

- Physically moving a pupil from a situation where there is an imminent risk of a violent incident and where the pupil has refused to respond to a reasonable verbal request.
- Holding pupils to restrict their movements.
- Retaining a pupil in a confined area in order to prevent individuals or property being damaged. (It is illegal to lock a pupil or a staff member in a room or cupboard which they cannot leave of their own volition).

Total Restraint is where pupils are held in such a way which prevents them from moving. This could mean a pupil being held on the floor. This is an extreme form of restraint and would be used only when an assault was being thought a serious risk to others.

Staff should be aware that for some pupils, the use of physical restraint may act as positive reinforcement for their behaviour.

Should staff have cause to use physical restraint, details must be recorded and the incident reported to the Headmaster, Deputy Headmaster or Headmaster of Pre-Prep as appropriate, who will ensure that parents are informed before the end of the day.

Appendix 6 – Prevent Duty – Anti-terrorism & Anti-radicalisation of Vulnerable People

Preventing Radicalisation

In accordance with the Counter-Terrorism and Security Act 2015, which received Royal Assent on 12 February 2015, as a school we have due regard and assess the risk so as to prevent people from being drawn into terrorism (“the Prevent duty”) and also to guidance issued by the Secretary of State.

The school is aware of its obligation as referred to in the KCSIE September 2021 of our need to be a partner of a Channel panel as required and assesses the risk where appropriate. In order to reduce risks and build resilience including to radicalisation, with particular attention to staying safe online and the dangers of cyber-bullying and sexting – even if pupils in a particular faith community are not meant to use mobile phones or have limited access to the internet, the safe use of electronic equipment and the internet, the children are taught, age appropriately about the wider implications of safeguarding, not only in schools but also beyond, through , about safeguarding through a planned component of the curriculum: Learning4Life, SMSC and PSHE.

What is Prevent?

The Prevent Strategy is a cross-Government policy that forms one of the four strands of CONTEST: the United Kingdom’s Strategy for Counter Terrorism. It includes the anti-radicalisation of vulnerable adults and children.

CONTEST as a counter-terrorism strategy is organised around four work streams, each comprising a number of key objectives:

- **PURSUE:** To stop terrorist attacks;
- **PREVENT:** To stop people becoming terrorists or supporting terrorism;
- **PROTECT:** To strengthen our protection against a terrorist attack; and
- **PREPARE:** To mitigate the impact of a terrorist attack.

Prevent is designed to stop people from supporting terrorism or becoming terrorists themselves. The importance of identifying radicalisation as early as possible continues to be highlighted: when successful, radicalised individuals can be prevented from perpetrating criminal acts which significantly affect their own lives as well as those of their victims and their families and local communities.

Prevent now addresses radicalisation to all forms of terrorism, including the extreme right-wing, for example, and the non-violent, which can popularise views that terrorists exploit. Action to address forms of extremism such as these should be prioritised locally according to the risks faced. To assist in this, though the current Prevent strategy has widened its scope, its focus has been reduced to these key objectives:

- **IDEOLOGIES:** To respond to the ideological challenge of terrorism and the threat we face from those who promote it;

- **INDIVIDUALS:** To prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- **INSTITUTIONS:** To work with a wide range of sectors (including education, criminal justice, faith, charities, the internet and health) where there are risks of radicalisation.

What do we mean by the term terrorism?

Although there is no generally agreed definition of terrorism internationally, in the United Kingdom the Terrorism Act 2000 defines terrorism as:

The use or threat of action designed to influence the government or an international governmental organisation or to intimidate the public, or a section of the public; made for the purposes of advancing a political, religious, racial or ideological cause; and it involves or causes: serious violence against a person; serious damage to a property; a threat to a person's life; a serious risk to the health and safety of the public; or serious interference with or disruption to an electronic system.

What do we mean by the term radicalisation?

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

There is no obvious profile of anyone likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame.

What do we mean by the term prevention?

Prevention means reducing or eliminating the risk of individuals or groups becoming involved in terrorism. Prevent involves the identification and referral of those susceptible to violent extremism into appropriate interventions. These interventions are aimed to stop the vulnerable being radicalised.

Extremists will always target the vulnerable in a bid to spread their firmly held, but flawed, ideologies, but we must tackle them at source and prevent people being brainwashed into terrorism. For further information refer to:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/396030/preventing-violent-extremism-systematic-review.pdf

Channel

Channel is a multi-agency process for identifying, referring and supporting a person at risk of radicalisation, focusing on early intervention and engagement. Through Channel we aim to:

- Identify people at risk of being drawn into terrorism
- Assess the nature and extent of that risk; and
- Develop the most appropriate support plan for the individual or individuals concerned

Participation in Channel is voluntary and can lead to a wide package of support, such as mentoring, life skills, therapies, housing support, and drug and alcohol support. This is delivered by agencies working together from across the children and adult's workforce, such as local authority, health, education, police, and voluntary and community organisations. Where the support needs can't be met through existing mainstream provision locally, the panel can access specialist support, including Channel intervention providers, approved by the Home Office.

Who can receive support through Channel?

Support through Channel may be appropriate for anyone who is vulnerable to being drawn into terrorism. This includes children or adults of any faith or ethnicity or background. The aim is to reach people before their vulnerabilities are exploited by those who want them to embrace terrorism and they are drawn into committing terrorist-related activity.

Channel is not suitable for anyone who you believe has, or is about to, commit a criminal offence. In this instance, staff should contact the police for an emergency response.

The DSL ensures that staff have adequate training that gives knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas that can be used to legitimise terrorism and are shared by terrorist groups. They are informed as to where and how to refer children and young people for further help. The school ensures pupils are kept safe from terrorist and extremist material when accessing the internet in school, by establishing appropriate levels of filtering.

Appendix 7 – Use of Mobile/Smart Phones and Cameras in EYFS

Westbourne House School recognises that mobile phones and cameras have the potential to be misused in certain contexts (misuse includes the taking and distribution of indecent images, exploitation and bullying). Therefore, we have additional guidelines that must be adhered to in the EYFS:

Personal Mobile/Smart Phones:

- Parents and visitors are alerted to the fact that the EYFS is a mobile/smart phone free zone through clear signage to this effect. Visitors using a smartphone will not be allowed access to the premises until it is switched off and put away;
- Personal mobile/smart phone usage is kept to a minimum. Staff at the Nursery must only use their personal mobile/smart phones when on a break and only when in the Staff Room or, if appropriate, when off-site without pupils.
- Staff in Reception must ensure that mobile/smart phones are stowed away and out of the reach of pupils and must only be used in the Staff Room or in classrooms where no pupils are present and when the member of staff is not supervising pupils. Personal mobile/smart phones are never used by staff in any rooms occupied by pupils and staff are not permitted to use their mobile/smart phones to take photographs of children.
- Throughout the school, all personal mobile/smart phones are kept securely in the Staff Room or stowed away from reach, along with other personal belongings. All mobile/smart phones should be locked with a passcode so that the owner is the only person able to use the device;
- Members of staff ensure that the main telephone number of the School and Pre-Nursery and Nursery is known to immediate family should they need to be contacted in an emergency;
- In case of an emergency, staff (including EYFS) take their mobile/smart phones when taking children off-site for trips or around the Westbourne House School site eg: swimming, Forest School etc. The making or receiving of personal calls is not permitted;
- Members of staff, throughout the school, do not use their personal mobile/smart phones to take photographs of children on outings or trips. School cameras are to be used for this purpose. (See Photography section below)

Cameras and Use of Photographs (please also refer to the Taking, Storing & Using Images Policy):

- Members of staff are instructed not to bring their own camera into school. Staff are not permitted to use their own mobile camera phones to take photographs of pupils. They must use the school cameras or devices purchased/provided for the purpose.
- Photographs taken of children in the EYFS are taken for valid reasons: for the recording of curriculum activities in action, recording of the learning and development of pupils

for observation records and profiles and for evidence for ISI Inspections and for marketing purposes. We also use photographs for displays within the EYFS setting;

- The permission of parents and carers will always be sought before any images are used in outside promotional materials;
- Parents are reminded that photographing or recording of their own children at special events should not include other children, unless permission is sought from those parents;
- Parents are strongly advised not to place photos of other people's children on social media sites (e.g. Facebook) without the express permission of the parents concerned;
- Staff are aware of their data protection responsibilities and images are stored securely and centrally on the school's secure network. No external access is available;
- Staff are discouraged from taking documents including photographs off-site. Should they do so, for example, for the purposes of working at home, they are aware that they must take precautions to ensure the security of any such documentation.

Appendix 8 – Managing allegations against other pupils (Peer-on-peer Abuse)

Westbourne House has a zero-tolerance approach to peer-on-peer abuse. We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. All staff recognise that children are capable of abusing their peers (including online).

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour Policy. The school acknowledges that even when there are no reported cases of peer-on-peer abuse, this does not mean that it is not happening.

Part 5 of KCSIE contains comprehensive advice on handling allegation of sexual harassment, including whether a report to the police may be required in parallel with a referral to the children's social care. Part 5 of KCSIE should also be read alongside the Departmental advice: Sexual Violence and Sexual Harassment Between Children in School and Colleges.

Introduction

DfE guidance Keeping Children Safe in Education (September 2021) says that "governing bodies should ensure that there are procedures in place to handle allegations against other children". The guidance also states the importance of minimising the risks of peer-on-peer abuse.

In most instances, the conduct of students towards each other will be covered by the school's Behaviour Policy. However, some allegations might be of such a serious nature that they become safeguarding concerns. These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation; however, we are aware that the abuse may take any form.

Prevention

The school minimises the risk of allegations against other pupils by:

- Providing PHSE/Learning4Life as part of the curriculum, which will help students develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe.
- Having effective systems within our school for students to be able to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be looked into and addressed
- Liaising and working with other professionals to develop robust risk assessments for pupils that are identified as posing a potential risk to other students
- Liaising with specialists to deliver appropriate targeted work to pupils identified as being at potential risk e.g. protective behaviours work.

Allegations against other pupils (safeguarding issues)

Allegations of abuse or that are a safeguarding concern maybe made against other students within our setting. These may include allegations of physical abuse, emotional abuse, sexual abuse and sexual exploitation.

Safeguarding concerns or reports of abuse, in any form, may be made against students in our setting.

It may also be considered a safeguarding issue if the allegation:

- is being made against an older pupil and refers to their behaviour towards a younger or more vulnerable pupil;
- is of a serious nature, possibly including a criminal nature;
- puts other pupils in the school at risk, or raises the risk factor for others;
- indicates that other pupils may have been affected, harmed or be at risk or harm by this student;
- indicates that young people outside the school may be affected by this student;
- includes bullying (under the definition of emotional abuse) or intimidation

Specific safeguarding issues against another student may include:

- Physical abuse:
 - Pre-planned violence
 - Physical altercations
 - Forcing other to carry out violence
 - Forcing others to use drugs, alcohol or other substances
- Emotional abuse:
 - Bullying
 - Threats and Intimidation
 - Blackmail/extortion
- Sexual abuse:
 - Sexual assault
 - Indecent exposure
 - Indecent touching
 - Showing pornography to others
 - Forcing others to create/share/download indecent images
 - Sexting (see full guidance)
- Sexual exploitation
 - Encouraging/enticing other pupils to engage in inappropriate sexual behaviour
 - Photographing or videoing other children performing indecent acts
 - Sharing of nudes and semi-nudes through social media etc

Procedure for dealing with allegations of peer-on-peer abuse

When an allegation is made by a pupil against another student, which is of a safeguarding nature it should be reported to the DSL as soon as possible:

- A factual record must be kept (as normal safeguarding child protection procedures) and updated with all actions and outcomes
- The incident should not be investigated at this time
- The DSL will contact the MASH to discuss the case, and make a formal referral where appropriate
- If the allegation indicates that a potential crime has taken place the MASH will refer the case to the police
- Parents of both the alleged victim and the student being complained about should be informed, this should be discussed during the consultation with the MASH.
- A risk assessment will be considered at this time to protect all parties involved.
- It may be appropriate to exclude the alleged culprit against whom the report has been made for a fixed time in line with our school's behaviour policy and procedures.
- Police and social care will lead any investigation, however where neither police nor social care thresholds are met, our school will then undertake a thorough investigation following our school's policies and procedures.
- A risk assessment should be considered along with an appropriate supervision plan
- Support should be given to all student involved, and they should be involved in the relevant meetings and sign and agree to the plans that are set
- The plan should be monitored and review dates set

In cases of sexting, the school follows guidance given to school by the UK Council for Child Internet Safety (UKCCIS) published in 2017:

- <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

In cases where there are reasonable grounds for suspecting that a device has been used to commit an offence, such as the taking of an upskirting photograph, staff are permitted to search pupils and files on the device, which must be delivered to the police as soon as reasonably practical without deleting relevant images.

If allegations made directly to other agencies

In some circumstances parent or the alleged victims will report directly to other agencies. In these cases (if not police or social care) these agencies should make referrals to the MASH or the police.

MASH or police should liaise directly with the DSL for the school to inform them of the situation, or liaise with a member of the Local Authority Designated Officer (LADO) and schools safeguarding team who will contact the DSL with the information.

All professional involved can support with the risk assessment and management of such allegations

Appendix 9 – Low-Level Concerns Procedure

The School understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This procedure seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

This procedure applies to all staff and other individuals who work or volunteer in school and sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in or on behalf of the school.

Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in this policy are lived, monitored, and reinforced.

These procedures should be read in conjunction with KCSIE 2021 – September 2021 Part 4, Section 2.

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the school's Staff Behaviour & Code of Conduct Policy, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO

Examples of behaviour that could require reporting of a low-level concern 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;
- using inappropriate sexualised, intimidating or offensive language.

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.

It is crucial that any such concerns, including those which do not meet the harm threshold (please refer to the school's Staff Behaviour & Code of Conduct Policy), are shared responsibly and with the right person, and recorded and dealt with appropriately.

Ensuring they are dealt with effectively should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Reporting low-level concerns

Where a low-level concern has been identified, this should be reported as soon as possible to the Headmaster; however, it is never too late to share a low-level concern.

Where the Headmaster is not available, the information will be reported to the DSL (or deputy), i.e. the most senior member of SMT acting in this role. Where the low-level concern has been reported to the DSL, they will inform the Headmaster of the details as soon as possible.

Low-level concerns about the DSL should be reported to the Headmaster and those about the Headmaster should be reported to the Chairman of Governors.

Recording concerns

A summary of the low-level concern should be written down, signed, timed, dated and shared by the person bringing the information forward. Low-level concern forms are available from the Pre-Prep and Prep School staffrooms, as well as electronically on the staff shared google drive.

Where concerns are reported verbally to the Headmaster, a record of the conversation will be made by the Headmaster which will be signed, timed, and dated.

As of January 2022, all concerns should be reported via the school's online safeguarding tool: CPOMS.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Headmaster will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or police (HR advice may also need to be taken)

Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses. The information reported and gathered will then be reviewed to determine whether the behaviour:

- is consistent with the school's Staff Behaviour & Code of Conduct Policy: no further action will be required
- constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g. via the disciplinary procedures.

- is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and HR advice taken as appropriate.

Allegations procedure within this policy and the Disciplinary Policy will be followed:

- when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and HR advice taken if appropriate. In this case the school's Staff Behaviour & Code of Conduct Policy and Disciplinary Policy will be followed

When considered with any other low-level concerns that have previously be made, records will be made of:

- all internal conversations including any relevant witnesses
- all external conversations, e.g. with the LADO
- the decision and the rationale for it
- any action taken.

Spectrum of Behaviour

Allegation

Behaviour which indicates that an adult who works with children has:

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

Low-Level Concern

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. 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 may have acted in a way that:

- is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate Conduct

Behaviour which is entirely consistent with the School's Staff Code of Conduct, and the law.

Can the reporting person remain anonymous?

Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named, the School will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the School will not promise anonymity to members of staff who share low-level concerns.

Should staff report concerns about themselves (i.e. self-report)?

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

- it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
- it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
- crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

The School's aim is to create an environment where staff are encouraged and feel confident to self-refer.

Where behaviour is consistent with the Staff Behaviour & Code of Conduct Policy

Feedback will be given to both parties to explain why the behaviour was consistent with the Staff Behaviour & Code of Conduct Policy.

How often should the low-level concerns file be reviewed?

The Headmaster will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made.

Where a pattern of behaviour is identified in respect of a specific individual, the Headmaster will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the School should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

References

Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

Low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

What is the role of the Governors?

The Headmaster will inform the Governors about the implementation of the low-level concerns procedures including any evidence of its effectiveness, e.g. with relevant data. The safeguarding governor may also review an anonymised sample to ensure that these concerns have been handled promptly and appropriately

Appendix 10 – Part One: Safeguarding Information for all Staff (KCSIE)

Keeping Children Safe in Education – Part 1

Statutory guidance and information for schools and colleges
from the Department of Education – September 2021
(copy attached which includes Annex A)

Monitoring and review

The School will monitor the effectiveness of this whole policy and its compliance. This policy and its appendices will be kept up-to-date and amended to take account of legislative changes as and when they occur

Last Review Date	Next Review Date	Reviewer(s)
December 2021	August 2022 <i>(or on the release of new ISI Regulations and/or KCSIE)</i>	Designated Safeguarding Lead Head of Pre-Prep Governor with Responsibility for Safeguarding IENCo

Approved by:

Headmaster on behalf of the school:

Chairman on behalf of the Governors:

Designated Safeguarding Lead:

Safeguarding Governor:

Date:



Department
for Education

Keeping children safe in education 2021

**Statutory guidance for schools and
colleges**

**Part one: Information for all school and
college staff**

September 2021

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Summary

Keeping children safe in education is statutory guidance that schools and colleges in England must have regard to when carrying out their duties to safeguard and promote the welfare of children.

It is essential that **everybody** working in a school or college understands their safeguarding responsibilities. Governing bodies and proprietors should ensure that those staff who work directly with children read at least Part one of the guidance.

Governing bodies and proprietors, working with their senior leadership teams and especially their designated safeguarding lead, should ensure that those staff who do not work directly with children read either Part one or Annex A (a condensed version of Part one) of the full version of the document. This is entirely a matter for the school or college and will be based on their assessment of which guidance will be most effective for their staff to safeguard and promote the welfare of children.

The full version of KCSIE can be found here: [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/keeping-children-safe-in-education)

About this guidance

We use the terms “**must**” and “**should**” throughout the guidance. We use the term “**must**” when the person in question is legally required to do something and “**should**” when the advice set out should be followed unless there is good reason not to.

Part one: Safeguarding information for all staff

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance Working Together to Safeguard Children.
2. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
 - protecting children from maltreatment;
 - 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; and
 - taking action to enable all children to have the best outcomes.
5. Children includes everyone under the age of 18.

The role of school and college staff

6. School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
7. All staff have a responsibility to provide a safe environment in which children can learn.

8. **All** staff should be prepared to identify children who may benefit from early help.¹ 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.

9. **Any staff member** who has **any** concerns about a child's welfare should follow the processes set out in paragraphs 55-70. Staff should expect to support social workers and other agencies following any referral.

10. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.

12. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.²

What school and college staff need to know

13. **All** staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include the:

- child protection policy, which should amongst other things also include the policy and procedures to deal with peer on peer abuse;
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);³
- staff behaviour policy (sometimes called a code of conduct);
- safeguarding response to children who go missing from education; and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

¹ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).

² The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.

³ All schools are required to have a behaviour policy (full details are here). If a college or chooses to have a behaviour policy it should be provided to staff as described above.

Copies of policies and a copy of Part one (or Annex A, if appropriate) of the full document should be provided to **all** staff at induction.

14. **All** staff should receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

15. **All** staff should be aware of their local early help⁴ process and understand their role in it.

16. **All** staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.⁵

17. **All** staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

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

What school and college staff should look out for

Early help

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

- is disabled or has certain health conditions and has specific additional needs;

⁴ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#)

⁵ More detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

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

Abuse and neglect

20. **All** staff should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect (see paragraphs 26-30), and specific safeguarding issues such as child criminal exploitation and child sexual exploitation (see paragraphs 32-39) so that staff are able to identify cases of children who may be in need of help or protection.

21. If staff are unsure, they should **always** speak to the designated safeguarding lead, or deputy.

22. **All** school and college staff should be aware that abuse, neglect 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 with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or deputy).

23. **All** staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children

outside of these environments. **All** staff, but especially the designated safeguarding 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 exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

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

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

Indicators of abuse and neglect

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

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

28. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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.

29. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and **all** staff should be aware of it and of their school or college's policy and procedures for dealing with it, (see paragraph 49).

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

Safeguarding issues

31. **All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos⁶ can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

32. Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into

⁶ Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Criminal Exploitation (CCE)

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

34. 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.

35. 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.

Further information about CCE including definitions and indicators is included in the Annex.

Child Sexual Exploitation (CSE)

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

37. 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.

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

39. Further information about CSE including definitions and indicators is included in the Annex.

Female Genital Mutilation (FGM)

40. Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.⁷ If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See Annex for further details.

Mental Health

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

42. 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.

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

44. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.

⁷ Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

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

Peer on peer abuse (child on child)

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

47. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

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

49. Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence,⁸ such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment,⁹ such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

⁸ For further information about sexual violence see Annex.

⁹ For further information about sexual harassment see Annex.

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos¹⁰ (also known as sexting or youth produced sexual imagery);
- upskirting,¹¹ 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).

50. **All** staff should be clear as to the school's or college's policy and procedures with regard to peer on peer 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.

Serious violence

51. **All** staff should be aware of the indicators, which may signal 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 (see paragraphs 33-35).

52. **All** staff should be aware of the range of 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 and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).¹²

¹⁰ UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#)

¹¹ For further information about 'upskirting' see Annex.

¹² For further information about county lines see Annex

Additional information and support

53. Departmental advice [What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of potential indicators of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

54. **The Annex** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

What school and college staff should do if they have concerns about a child

55. 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.

56. If staff have **any concerns** about a child’s welfare, they should act on them **immediately**. See page 23 for a flow chart setting out the process for staff when they have concerns about a child.

57. If staff have a concern, they should follow their own organisation’s child protection policy and speak to the designated safeguarding lead (or deputy).

58. Options will then include:

- managing any support for the child internally via the school’s or college’s own pastoral support processes;
- undertaking an early help assessment;¹³ or
- making a referral to statutory services,¹⁴ for example as the child might be in need, is in need or suffering, or is likely to suffer harm.

¹³ Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of [Working Together to Safeguard Children](#).

¹⁴ Chapter 1 of [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children’s social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children’s social care.

59. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

60. 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). [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Early help

61. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Statutory children's social care assessments and services

62. Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

63. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges

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. Additional information is available here: [Contextual Safeguarding](#).

64. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

Children in need

65. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm:

66. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

What will the local authority do?

67. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services;
- the child is in need and should be assessed under section 17 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process; and

- further specialist assessments are required to help the local authority to decide what further action to take.

68. The referrer should follow up if this information is not forthcoming.

69. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).

70. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

71. **All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

72. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Why is all of this important?

73. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare.

Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.¹⁵ Further information about serious case reviews can be found in Chapter four of [Working Together to Safeguard Children](#). Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;

¹⁵An analysis of serious case reviews can be found at gov.uk/government/publications/analysis-of-serious-case-reviews-2014-to-2017.

- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information with the right people within and between agencies;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

What school and college staff should do if they have safeguarding concerns about another staff member

74. Schools and colleges should have processes and procedures in place to manage any safeguarding concerns about staff members (including supply staff, volunteers, and contractors). If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs). Details of your local LADO should be easily accessible on your local authority's website.

Further details can be found in Part four of this guidance.

What school or college staff should do if they have concerns about safeguarding practices within the school or college

75. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

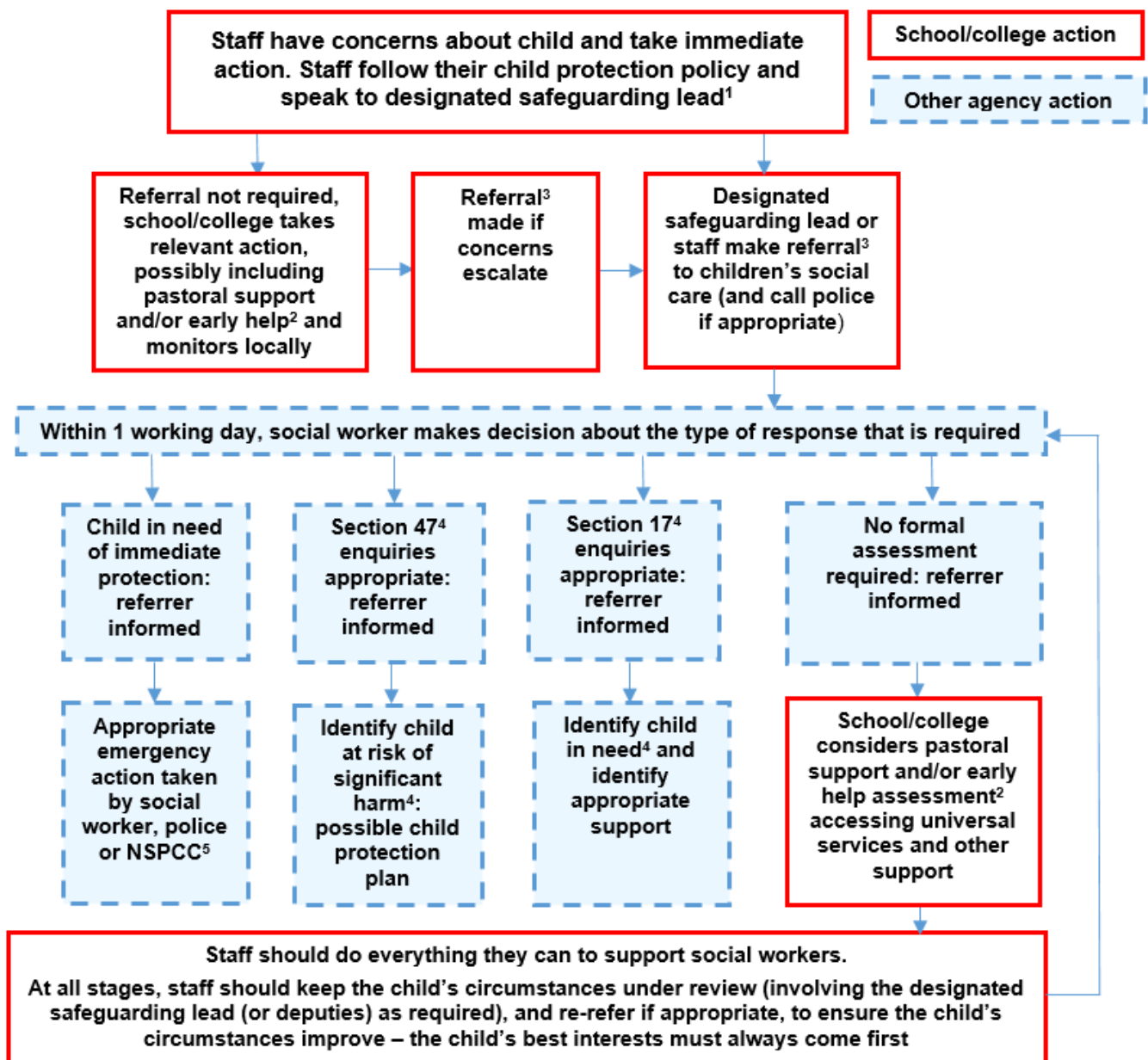
76. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's or college's senior leadership team.

77. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.¹⁶

¹⁶ Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

⁵ This could include applying for an Emergency Protection Order (EPO).

Annex: Further information

This annex contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part one of this guidance, if staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

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Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at:

www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

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

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

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

Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and 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, 'honour'-based abuse or risk of forced marriage. Early intervention is

necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

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

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

County lines

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 schools (mainstream and special), 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 CSE and CCE 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 and are subsequently found in areas away from their home;
- have been the victim or 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.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#).

Modern Slavery and the National Referral Mechanism

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Operation Encompass

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)
- [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

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 into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, 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 school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

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

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider

network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**¹⁷ that requires a different approach (see following section).

FGM

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

FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

¹⁷ Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

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

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage>. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

¹⁸ Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

- **Extremism**¹⁹ is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation**²⁰ refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism**²¹ is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due

¹⁹ As defined in the Government's Counter Extremism Strategy
<https://www.gov.uk/government/publications/counter-extremism-strategy>.

²⁰ As defined in the Revised Prevent Duty Guidance for England and Wales.
<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

²¹ As defined in the Terrorism Act 2000 (TACT 2000) <http://www.legislation.gov.uk/ukpga/2000/11/contents>

regard²² to the need to prevent people from being drawn into terrorism”.²³ This duty is known as the Prevent duty.

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

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#).

Additional support

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

²² According to the Prevent duty guidance ‘having due regard’ means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

²³ “Terrorism” for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

Peer on peer/ child on child abuse

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It **can** happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. This **can** include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; 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 and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Sexual violence and sexual harassment between children in schools and colleges

Context

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

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

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

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

Staff should be aware of the importance of:

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

What is sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen

both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003²⁴ as described below:

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

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

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

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

What is consent?²⁵ 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.²⁶ Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

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

²⁴ [Legislation.gov.uk](#).

²⁵ It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way. More information: [here](#).

²⁶ [PSHE Teaching about consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

- the age of consent is 16; ²⁷
- sexual intercourse without consent is rape.

Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. ²⁸ It may include:
- consensual and non-consensual sharing of nude and semi-nude images and/or videos. ²⁹ As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;

²⁷ It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice.

²⁸ [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

²⁹ Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

- sharing of unwanted explicit content;
- upskirting (is a criminal offence³⁰);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

Upskirting³¹

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

³⁰ [The Voyeurism \(Offences\) Act 2019](#) which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

³¹ Additional information can be found at [GOV.UK](#).

Toolkits

- [Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.](#)
- [Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.](#)
- [Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.](#)
- [Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.](#)
- [NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.

Additional advice and support

Abuse

- [What to do if you're worried a child is being abused](#) – DfE advice
- [Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- [Faith based abuse: National Action Plan](#) - DfE advice
- [Relationship abuse: disrespect nobody](#) - Home Office website
- [Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper
- [Together we can stop child sexual abuse](#) – HM Government campaign

Bullying

- [Preventing bullying including cyberbullying](#) - DfE advice

Children missing from education, home or care

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

Children with family members in prison

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

Child Exploitation

- [Trafficking: safeguarding children](#) - DfE and HO guidance
- [Care of unaccompanied and trafficked children](#) – DfE statutory guidance
- [Modern slavery: how to identify and support victims](#) – HO statutory guidance

Drugs

- [Drug strategy 2017](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website
- [Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association website

(so called) “Honour Based Abuse” including FGM and forced marriage

- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance
- [Forced marriage](#) - Forced Marriage Unit (FMU) statutory guidance
- [FGM resource pack](#) – HM Government guidance

Health and Well-being

- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [Medical-conditions: supporting pupils at school](#) - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice

Homelessness

- [Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities & Local Government guidance

Private fostering

- [Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

- [Prevent duty guidance](#)- Home Office guidance
- [Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

Violence

- [Serious violence strategy](#) - Home Office Strategy
- [Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
- [Youth Endowment Fund](#) – Home Office
- [Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- [Sexual violence and sexual harassment between children in schools and colleges](#)- DfE advice



Department
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