

John Clifford School



Site Specific Arrangements for Safeguarding and Child Protection

Document Owner	Headteacher
Effective From	01/09/2022
Next Review Date	31/08/2023

1	Introduction	
2	Key Staff and Contacts	
3	Children and Young People who may be particularly vulnerable	
4	Children with special educational needs or disabilities	
5	Allegations against staff or volunteers	
6	Whistleblowing	
7	Staff Training	
8	Safer Recruitment	
9	Volunteers	
10	Contractors	
11	Site Security	
12	Extended school and off-site arrangements	
13	Teaching our pupils about safeguarding	
	Child Protection Procedures	
14	Recognising Abuse	
15	Taking Action	
16	If you are concerned about a pupil's welfare	
17	If a pupil discloses to you	
18	Notifying parents	
19	Confidentiality and sharing information	
20	Early Help	
21	Referral to children's social care	
22	Reporting directly to child protection agencies	
23	Escalating concerns	
	Specific Safeguarding and Child Protection Issues	
24	Mental Health and Wellbeing	
25	Child abduction and community safety incidents	
26	Children and the court system	
27	Children missing education	
28	Children with family members in prison	
29	Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	
30	County Lines	
31	Modern Slavery and the National Referral Mechanism	
32	Cybercrime	
33	Domestic Abuse	
34	Operation Encompass	
35	Homelessness	
36	So-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)	

37	Forced Marriage	
38	Preventing Radicalisation	
39	Children with sexually harmful behaviour	
40	Peer-on-Peer / child-on-child abuse	
41	Serious violence	
42	Private fostering arrangements	
43	Looked after children	
44	Work experience	
45	Children staying with host families	
	Appendix One: Four categories of abuse	
	Appendix Two – Concerns Flowchart	
	Appendix Three – Sexual violence and sexual harassment between children in schools and colleges	
	Appendix Four – Online Safety	
	Appendix Five – Further Reading / Additional Information Sources	
	Appendix Six - Police and Criminal Evidence Act (1984) – Code C	

1. Introduction

This document sets out the arrangements for Safeguarding and Child Protection at John Clifford School.

John Clifford School is committed to Safeguarding and encourages a strong culture of vigilance.

This document should be read alongside:

- White Hills Park Trust: Trust Safeguarding Policy September 2022;
- White Hills Park Trust: Managing Allegations Against Adults Working within the Trust Policy;
- DfE Keeping Children Safe in Education – September 2022;
- Working Together to Safeguard Children – July 2018;
- Local arrangements for managing allegations issued through the relevant Local Safeguarding Partnership;
- Sexual violence and sexual harassment between children in schools and colleges 2021;
- The Children Act 1989 and 2004;
- The Children and Social Work Act 2017;
- The Education Act 2002;

For the purpose of this document the following terminology should be considered:

- **Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment; preventing impairment of children's mental and physical health and development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- **Child protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.
- **Staff** refers to all those working for or on behalf of the school, full-time or part time, temporary or permanent, in either a paid or voluntary capacity.
- **DSL** refers to the Designated Safeguarding Lead at the school.
- **Child** includes everyone under the age of 18.
- **Parents** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents and LA corporate parents.

2. Key Staff and Contacts

School Based Contacts

Name	Role
Janine Waring	Headteacher
Janine Waring	Designated Safeguarding Lead
Tanya Jacques-Tolley Kayley Allcoat Karen Haywood	Deputy Designated Safeguarding Leads
Dan Gooch	eSafety Officer
Janine Waring	Prevent Duty Lead
Craig Hayward-Mitchell	Designated Teacher for Looked After Children
Janine Waring	Designated Teacher for Previously Looked After Children
Tracey Coyle	Attendance Officer
Janine Waring	Safer Recruitment
Carol Bamford	Safeguarding Governor
All of the above can be contacted via the School Office on office@johnclifford.school	

Other Useful Contacts

Agency / Contact	Contact Details
Paul Heery, White Hills Park Trust CEO / DSL	0115 916 8900 paul.heery@whptrust.org
Jacque Sainsbury, Trust Deputy DSL	jacque.sainsbury@whptrust.org
Sue Vasey, Safeguarding Trustee White Hills Park Trust Trust	safeguarding@whptrust.org
Children's Social Care – Emergency Duty Team Nottinghamshire County Council	0300 456 4546

Local Authority Designated Officer (LADO) Nottinghamshire County Council	0115 977 3921
Child Line	0800 1111
NSPCC Information Service	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285

The Designated Safeguarding Lead (DSL):

- is a member of the Senior Leadership Team;
- has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff;
- is available during school hours during term time either in person or remotely to discuss any safeguarding concerns (or delegates responsibility for this to a Deputy DSL);
- refers cases of concern to children's social care, the Channel Programme or police as appropriate;
- acts as a source of support, advice and expertise to the school community;
- encourages a culture of listening to children and ensures the child's voice is included in all decision-making processes;
- develops effective links with relevant statutory and voluntary agencies including the Local Safeguarding Partnership (LSP);
- liaises with the 'case manager' and the Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a staff member;
- liaises with other relevant staff (school and multi-agency) on matters of wellbeing, safety and safeguarding;
- liaises with relevant mental health leads/agencies where safeguarding concerns are linked to mental health;
- promotes engagement with parents, particularly where families are facing challenging circumstances;
- liaises with the Headteacher and strategic leads to take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children are or have experienced and identifies the impact these issues may have on attendance, engagement, and achievement – including providing information regarding all students with social worker involvement and supporting teaching staff to provide any additional adjustments to ensure the best outcomes for the student;
- keeps detailed written records of all concerns using CPOMS and ensures all records meet Trust expectations in terms of content;
- understands the importance of information sharing (within relevant data protection legislation and regulations – including GDPR) within the school and with other relevant agencies;
- ensures that when a pupil leaves the school, their child protection file is passed to the new school (separately from the main student file and ensuring secure transit) within five days of transfer or five days of a new term and confirmation of receipt is obtained. Consideration should also be given to the sharing of additional information to ensure continued support for students within the new placement;

- ensures all staff have access to and knowledge of the school safeguarding procedures – including during induction for new, part-time, agency and supply staff;
- ensures that the child protection policy and procedures are reviewed and updated annually;
- makes staff aware of training courses and the latest policies on safeguarding;
- makes the child protection policy available publicly, on the school's website or by other means making clear the fact that referrals to external agencies will be made regarding suspected abuse or neglect and the school's role in this;
- is appropriately trained, with regular updates;
- has a working knowledge of local procedures, including Early Help and Local Authority social care referral arrangements;
- understands the lasting impact that trauma and adversity can have on behaviour, mental health and wellbeing;
- is alert to specific needs of children in need, SEND students and those with health conditions and young carers;
- attends and/or contributes to child protection conferences;
- coordinates the school's contribution to child protection plans;
- understands the requirements of the Prevent Duty and able to provide advice and support regarding children at risk of radicalisation; and
- understands the unique risks of online safety and ensures students are aware of how to keep themselves safe online within the school and at home.

The Deputy Designated Safeguarding Lead:

Is trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

3. Children and Young People who may be particularly vulnerable

Any child may benefit from Early Help, but some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues, reluctance on the part of some adults to accept that abuse can occur and contextual safeguarding issues. To ensure that all of our pupils receive equal protection, we will give special consideration to children who:

- are subject to Child in Need or Child Protection Plans or have other social care involvement;
- are disabled or have certain health conditions and have specific additional needs;
- have special educational needs (whether or not they have a statutory

Education, Health and Care Plan);

- are young carers;
- show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- are frequently missing/go missing from care or from home;
- are at risk of modern slavery, trafficking, sexual exploitation or criminal exploitation;
- are at risk of being radicalised or exploited;
- have a family member in prison or is affected by parental offending;
- are in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- are misusing drugs or alcohol themselves;
- have returned to their family from care;
- are at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- are privately fostered;
- are persistently absent from education, including persistent absences for part of the school day;
- are asylum seekers;
- are vulnerable to being bullied, or engaging in bullying;
- are living in temporary accommodation;
- are living transient lifestyles;
- are living in chaotic and unsupportive home situations;
- are homeless;
- are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- do not have English as a first language;
- are within the court system.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

4. Children with special educational needs or disabilities

John Clifford School recognises that children and young people with special educational needs and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect such as:

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

- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

5. Allegations against staff or volunteers

When an allegation is made against a member of staff, our set procedures **must** be followed. The full procedures for dealing with allegations against staff can be found in the Trust's Managing Allegations Against Adults Working Within the Trust Policy.

If you have a concern about an adult working within the school, please contact:

Name	Role	Contact Number
Janine Waring	Headteacher	0115 9258057

If your concern relates to the Headteacher, please contact:

Name	Role	Contact Number
Paul Heery	Trust CEO / DSL	0115 916 8900

6. Whistleblowing

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

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.

If it becomes necessary to consult outside the school, they should follow the Trust Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285, the line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk

7. Staff training

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

All staff will undertake training each September, covering as a minimum:

- Signs and symptoms of abuse and neglect (including online safety);
- Local procedures for responding to concerns;
- The school's behaviour policy;
- Response to children that go missing in education;
- The staff code of conduct; and
- Allegations management.

Any staff joining the school throughout the academic year, whether permanent, part time, agency or supply staff must also receive this training in a format appropriate to the setting and circumstances.

The level of additional training staff will receive is based on their role.

8. Safer Recruitment

All Safer Recruitment processes are overseen by the Trust HR Department and our school complies with the requirements of Keeping Children Safe in Education 2021 and the LSP by carrying out the required checks and verifying the applicant's identity, qualifications, and work history.

- At least one member of each recruitment panel will have completed safer recruitment training within the last **2 years**;
- All relevant staff are made aware of relevant legislation and their obligations to disclose relevant information;
- The school obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the school have been appropriately checked;
- Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained; and
- The school maintains a single central record of recruitment checks undertaken.

9. Volunteers

All volunteers working with the school will be risk assessed and will undergo checks commensurate with their work in the school, their contact with students and the supervision provided to them.

Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

10. Contractors

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised whilst pupils are on-site.

11. Site security

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The Headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

12. Extended school and off-site arrangements

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school, we will check

that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

13. Teaching our pupils about safeguarding

The children understand about keeping safe through the John Clifford Promises. Taking care of ourselves and each other runs through daily life and is promoted weekly.

Assemblies are used to address particular aspects of safety and these are age specific and scheduled. There is a half-termly assembly about online safety and a weekly PSHE focus for your group and class collective times. PSHE and SRE specific curriculums are designed to cover statutory elements of safety and guidance and the Whole School Curriculum Map should be consulted for the specifics of coverage.

Child Protection

Procedures

14. Recognising Abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education 2021 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

15. Taking action

Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "it could happen here". Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary call 999;
- report your concern as soon as possible to the DSL, definitely by the end of the day;
- do not start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern; and
- seek support for yourself if you are distressed.

16. If you are concerned about a pupil's welfare

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give them the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should record these early concerns following the agreed school process. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL.

17. If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let them know that in order to help them they must pass the information on to the DSL. The point at which they tell the pupil this is a matter for professional judgement. During their conversations with the pupil, staff will:

- listen carefully and allow them to speak freely;
- remain calm and not overreact;
- take it seriously;
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me' and confirm that it was right to tell;
- not be afraid of silences – do not stop the pupil from speaking freely;
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil's mother think about it;
- not speculate or accuse anyone or jump to conclusions (especially about the abuser);
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on and explain to whom and why;
- not automatically offer any physical touch as comfort;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' may be interpreted by the child to mean that they have done something wrong;

- tell the pupil what will happen next;
- report verbally to the DSL even if the child has promised to do it by themselves;
- Record the concern on CPOMS (or complete the record of concern form) immediately and hand it to the DSL as soon as possible; and
- seek support if they feel distressed

Effective Safeguarding Practice

- If possible, reports should be taken with two members of staff present (preferably one of these being a trained DSL)
- Careful management of reports that include an online element – additional guidance should be read and staff must remember that they must not view or forward images of children
- Not promising confidentiality but staff should only share the report with people who are required to progress the issue.
- Ensure the student understands what the next steps will be
- Recognising that a student will most likely disclose to an adult they trust – this could be anyone within the school and all staff should feel confident in taking details of a disclosure and should be supportive and respectful of the student
- Recognising that an initial disclosure to an adult may only be the first reported incident, not representative of a singular incident and that trauma can impact memory so students may not always be able to recall specific details or timelines
- Keeping in mind that certain students may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and / or sexual orientation
- Listening carefully to the student, reflecting back, using the student's language, being clear about boundaries and how the report will be progressed, not asking leading questions
- Considering how to make a record of the report. Best practice is to wait until the end of the report and write up a thorough summary to be recorded on CPOMS and shared with the DSL. If notes are made during the report staff should remain engaged with the student and not appear distracted
- Only recording the facts as the student presents them. Notes / records should not reflect any personal opinion of the member of staff.
- Informing the DSL as soon as possible (or Deputy DSL) if they are not involved in the initial report

18. Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

19. Confidentiality and sharing information

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

Staff should only discuss concerns with the DSL (or Deputy in their absence). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, Keeping Children Safe in Education 2022 emphasises that any member of staff can contact children's social care or the dedicated NSPCC helpline if they are concerned about a child.

Child protection information will be stored and handled in line with the GDPR and Data Protection Act 2018.

Information sharing is guided by the following principles. The information is:

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

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Child protection information will be stored separately from the pupil's pastoral file.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Headteacher to consider in line with the Trust Data Policies and inform the Trust Operations Team.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

20. Early Help

Early help services support families that fall below the child protection threshold. School uses the early help process to signpost them to supportive services. All referrals are made to MASH (the Multi-Agency Safeguarding Hub) who will signpost the local early help process if the specific concern does not meet the threshold of social care intervention.

21. Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

22. Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead, their deputy, the Headteacher and the Trust CEO are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety; and
- for any other reason they make a judgement that direct referral is in the best interests of the child.

23. Escalating concerns

Staff need to be aware of those times when concerns may look as though they are not progressing to an outcome or some form of action. This may be indicated by:

- difficulty in getting hold of a DSL;
- staff not being satisfied about the decision of the DSL or Headteacher;
- staff aware that a colleague has not passed on a concern;
- external agencies not accepting a referral from school when it is felt one is needed; or
- staff not aware of what has happened to their concern because of a lack of feedback.

It is important that staff do not close down a concern because they feel “stuck” or “they can’t do anymore”. It is important to escalate concerns to DSLs, Headteachers, other senior staff or if necessary, to the Trust CEO.

If there are concerns about the work of an external agency the school will follow the escalation steps outlined in the locally agreed procedures documents.

The important principle is not to allow a concern to be “closed down” without it having received the necessary attention, assessment and resolution.

If the options above have been explored fully and the concern still isn’t being handled effectively and therefore placing the child or young person at risk, it is important that you continue to escalate your concerns by contacting the Safeguarding Trustee or by contacting the NSPCC Whistleblowing Advice Line on 0800 028 0285.

Specific Safeguarding and Child Protection

Issues

24. Mental Health and Wellbeing

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, however, staff are well placed to identify where a child’s behaviour suggests 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 experiences, this can have a lasting impact throughout childhood. It is key that staff are aware of how these children’s experiences, can impact on their mental health, behaviour, and education.

All staff are made aware of the indicators of potential mental health concerns and will share these with the DSL.

There are many mechanisms set up to support the mental health and wellbeing of the children and the staff. All children are greeted daily by a senior member of staff and other staff on the playground so that handover from home to school is smooth and communication is enabled. There are always adults to talk to in the morning and the end of the day for discussion.

We have a fulltime time nurture provision that is staffed by a Nurture Lead and ELSA trained staff. The Honey Pot includes drop in sessions for breakfast for children and often siblings, for parents and for other staff. Children are invited but can also self-refer and no child will ever be turned away. Staff call in with children during the mornings sessions to ensure they are safe and able to learn and then there is specific nurture activity scheduled for children in the afternoon.

The Honey Pot has a front and back room and the front room is set up like a sitting room to allow children to feel comfortable and confident to share their thoughts and feelings. This is often a place where social care meetings and other wellbeing sessions are held.

25. Child abduction and community safety incidents

Child abduction is the removal or retention of a minor from a parent or anyone with legal responsibility for the child. It can be committed by parents or other family members, by people known but not related to the victim and by strangers.

Staff should be vigilant regarding community safety incidents within the vicinity of the academy and ensure that all information is passed to the DSL in a timely manner – examples of incidents of concern may be loitering by unknown people or unknown adults engaging in conversation with students.

Children should also be provided with information in order to ensure they are able to keep themselves safe focussing on building confidence rather than simply stranger warnings.

26. 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. The families of children may also be subject to child arrangements processes through the family court system

We recognise that both circumstances may be stressful for children and appropriate support will be provided in line with local and national guidance.

27. Children missing education

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation as well as criminal exploitation, including involvement in county lines. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict

zones, risk of female genital mutilation or risk of forced marriage. The school will monitor unauthorised absence and take appropriate action including notifying the Local Authority, particularly where children go missing for extended periods of time, on repeated occasions and/or are missing for periods during the school day.

28. Children with family members in prison

Children who have family members that are sent to prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The school recognises that these children may need support. Support will be provided in line with guidance from the National Information Centre on Children of Offenders and local agencies.

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

Staff should be aware that different forms of harm 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.

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.

There are a range of factors that could contribute to a child's vulnerability to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status and access to economic or other resources.

Exploitation does not just include face to face contact, it can also occur online.

The definition of Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity a) in exchange for something the victim needs or wants and/or b) for the financial or other advantage of the perpetrator or facilitator and/or c) through violence or threat of violence.

Some of the following can be indicators of CCE:

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

This list is not exhaustive, staff should remain vigilant, and any concerns should be raised immediately with the DSL.

The definition of Child Sexual Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity a) in exchange for something the victim needs or wants, and/or b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

CSE can affect any young person, male or female, under the age of 18 years, including 16 and 17 year olds who can legally consent to sexual activity.

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

Indicators of CSE (in addition to those indicators for CCE) can include:

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

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.

The school includes the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff should be made aware of the indicators of sexual exploitation and all concerns must be reported immediately to the DSL.

30. 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 CCE and CSE indicators may also be applicable to where children are involved in county lines. Some additional specific indicators 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 they have no connection with, often called a 'trap house' or cuckooing or hotel room where there is drug activity;
- owe a debt to their exploiters; and
- have their bank accounts used to facilitate drug dealing

Academy staff will remain vigilant to those children and concerns will be shared with the DSL.

31. 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.

Concerns regarding these issues must be reported to the DSL and Headteacher (or other member of SLT) without delay.

32. 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 online) 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, supply or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cybercrime.

If there are concerns regarding a student in this area, this must be reported to the DSL and Headteacher (or other member of SLT) without delay in order to access additional support

33. Domestic abuse

The Domestic Abuse Act received Royal Assent on 29 April 2021. The act creates a statutory definition of domestic abuse based on the existing cross-government definition.

'Abusive behaviour' is defined in the act as any of the following:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse; and/or
- psychological, emotional or other abuse.

For the definition to apply, both parties must be aged 16 or over and 'personally connected'

'Personally connected' is defined in the act as parties who:

- are married to each other;
- are civil partners of each other;

- have agreed to marry one another (whether or not the agreement has been terminated);
- have entered into a civil partnership agreement (whether or not the agreement has been terminated);
- are or have been in an intimate personal relationship with each other;
- have, or there has been a time when they each have had, a parental relationship in relation to the same child; and/or
- are relatives.

The Act also recognises the impact of domestic abuse on children, as victims in their own right. All children can witness and be adversely affected by exposure to domestic abuse in the context of their home life where domestic abuse occurs between family members. This 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'. However, as with any child under the age of 18, standard safeguarding procedures should be followed.

Staff will remain vigilant to incidents of this type and will ensure support and intervention is available and provided to young victims and young perpetrators.

34. Operation Encompass

This operates in all police forces across England. DSL's (or Principals) will receive notification of when Police have been called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident. This should occur before the next school day.

Usual school safeguarding procedures should be followed if any further action is required following an Operation Encompass notification.

35. Homelessness

Being homeless, or being at risk of becoming homeless, presents a real risk to a child's welfare.

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.

The DSL (and deputies) should be aware of the contact details and referral routes into the Local Housing Authority so concerns can be raised and progressed in a timely manner. They will then be better able to support students facing homelessness by supporting and signposting through appropriate agencies and support networks within the locality.

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

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, 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. All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such by Academy safeguarding staff.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia or other injury to the female genital organs. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so Academy staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a female child about going on a long holiday during the summer vacation period.

There is a statutory duty upon teachers (section 5B of the Female Genital Mutilation Act 2003) which mandates that they must personally report to the police cases where they discover (either through disclosure by the victim or visual evidence – although visual evidence is likely to be an extremely rare occurrence for education staff and they should not be examining students) that an act of FGM appears to have been carried out on a girl under 18. Failure to do this may result in disciplinary action. This should be done with the support of the DSL so that wider concerns for the child or young person are also considered. This will also enable the Academy to support the staff member through this process.

Suspected cases, with no direct disclosure or visual evidence should be reported to the DSL without delay and usual academy safeguarding procedures should be followed.

37. Forced Marriage

A forced marriage is a marriage 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 consent can be where a person does not consent or where they cannot consent (if they have learning disabilities for example). Some perpetrators use perceived cultural practices as a way to coerce a person into marriage. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England, they play an important role in safeguarding children from forced marriage.

38. Preventing Radicalisation

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 terror 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 of 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.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Background factors combined with specific influences such as family or friends may contribute to a child's vulnerability.

Radicalisation can occur through many different methods, such as via social media or within the home environment.

Staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and

the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014).

The school has an identified Prevent Lead who will co-ordinate all concerns and necessary referrals related to extremism, radicalisation and terrorism.

39. Children with sexually harmful behaviour

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil's sexual behaviour, including any known online sexual behaviour, should speak to the DSL as soon as possible.

40. Peer-on-Peer / child-on-child abuse

The school recognises that pupils may become victims of abuse from other pupils. This can take many forms and occur inside and outside of school and online.

This is most likely to include, but may not be limited to, abuse within intimate partner relationships; bullying (including cyberbullying, prejudice-based and discriminatory bullying); 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 nudes and semi-nudes 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.

Sexual violence and harassment can occur between children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

All staff are trained to recognise incidents of peer on peer abuse and will report instances including, sexual violence and harassment through the normal safeguarding concern process and recognise that support must be provided to both the alleged victim and abuser. It will be made clear that no form of peer-on-peer abuse, sexual violence or sexual harassment will be tolerated or accepted as an inevitable part of growing up or banter, any behaviour of this type will be challenged by all adults working within the Trust and not normalised. Staff are aware that addressing inappropriate behaviour (even if it appears relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Our position as a school is clear: sexual violence and sexual harassment are never acceptable, will never be tolerated and are not an inevitable part of growing up. Such behaviour will never go unchallenged or become accepted and we remain committed to working openly and transparently with to promote mutual respect.

Our Safeguarding and Child Protection Policy has guidance within it around the indicators of peer on peer abuse and harmful sexual behaviour along with our response procedures. All relevant Safeguarding Policies are available on individual academy websites.

All pupils are taught the Relationships and Sex Education (RSE) curriculum.

The appropriate means for disclosing an allegation of abuse relating to another pupil is always to inform a member of the school's safeguarding team. In the event that an allegation is made against a member of staff, this must be sent to the Headteacher or directly to the Trust CEO. We will always act on concerns raised.

See Appendix 3 for further information regarding sexual violence and sexual harassment between children and school response and reporting procedures.

41. 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 significant change in wellbeing;
- signs of assault or unexplained injury; and/or
- unexplained gifts or new possessions.

These can all suggest that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.

There are a range of risk factors which all staff should be aware of which increase the likelihood of involvement in serious violence, such as having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery

42. Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private

fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the school should notify the Local Authority of the circumstances.

43. Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's virtual head for children in care.

44. Work experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in Keeping Children Safe in Education (2021).

45. Children staying with host families

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the Local Authority to check that such arrangements are safe and suitable. In such circumstances the school follows the guidance in Annex E of Keeping Children Safe in Education (2021) to ensure that hosting arrangements are as safe as possible.

Appendix One

Four categories of

abuse

Physical abuse

Physical abuse is 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 (this used to be called Munchausen's Syndrome by proxy but is now more usually referred to as fabricated or induced illness).

Emotional abuse

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or 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 in education (also known as peer on peer abuse).

Neglect

Neglect is 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 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 neglectof, or unresponsiveness to, a child’s basic emotional needs.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they ‘tell’. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other’s safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new ‘friends’

This is not an exhaustive list and individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

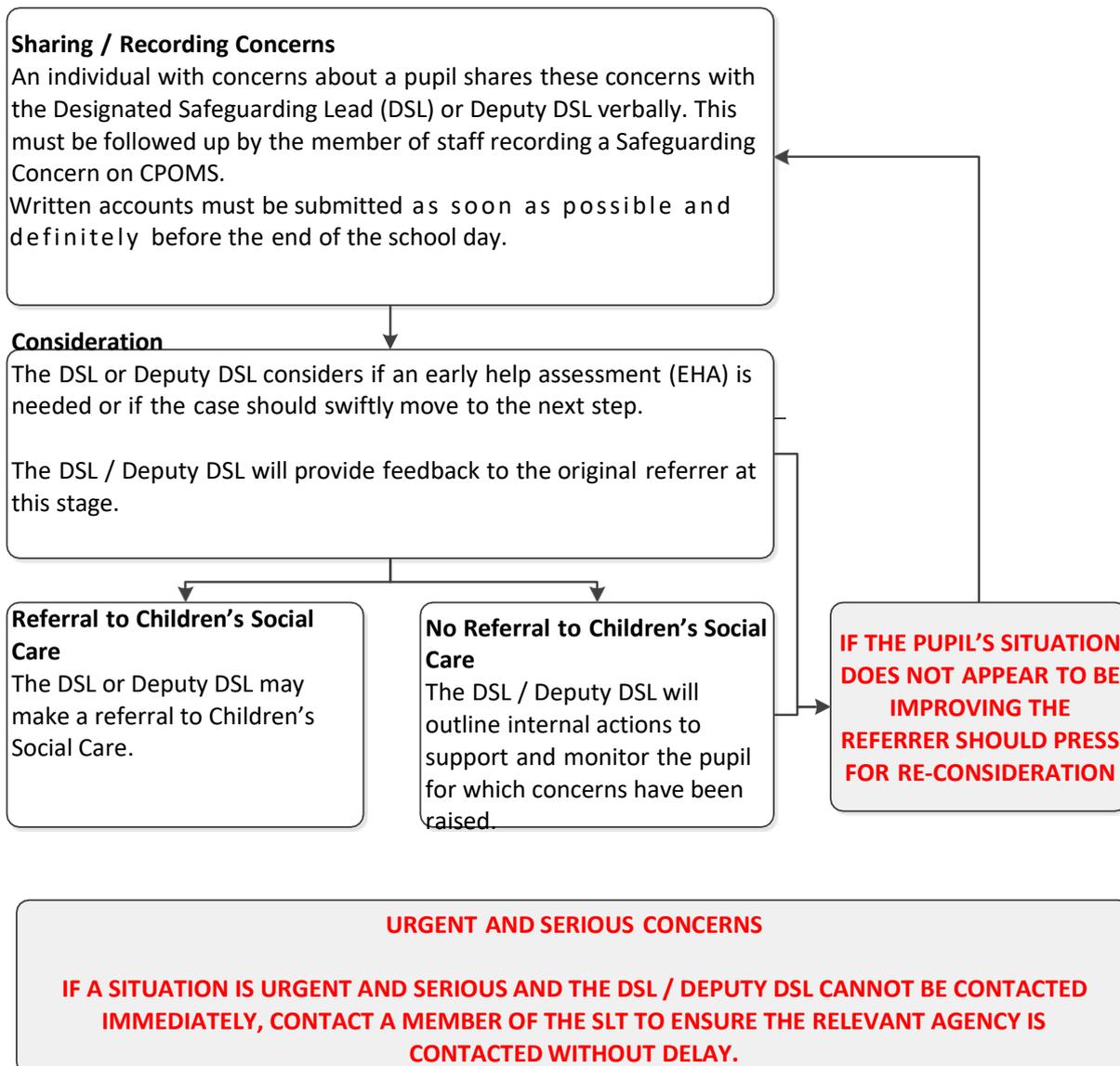
All staff must be aware that safeguarding indicators and/or behaviours can be associated with factors outside of school and/or can occur between children outside of these environments. Extra familiar harms take a variety of different forms and children can be vulnerable to multiple harms.

All staff must also 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 and the sharing of abusive and pornographic images to those who do not wish to receive such content.

Appendix Two – Concerns Flowchart



Appendix Three – 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 that children can, and sometime do, abuse their peers in this way and that it can happen inside and outside of school/college. 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 believe that B consents.

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

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

or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

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

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

It is important to remember that:

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

Sexual Harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual 'jokes' or taunting;
- physical behaviour, such as: deliberately brushing past 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 nudes and semi-nudes images and/or videos – taking and sharing nude photographs of under 18's is a criminal offence;
 - sharing of unwanted explicit content;
 - upskirting (is a criminal offence);
 - 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 or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to 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.

Any child will be listened to and supported by experienced and trained safeguarding staff. All staff should report any concerns to the Designated Safeguarding Lead as soon as possible.

All DSL's and Deputy DSL's should be familiar with Part 5 of Keeping Children Safe in Education (2021). The Trust will support with any sexual violence or sexual harassment concerns following Trust and Government Guidance.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent.

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage.

HSB can occur online and/or face to face and can occur simultaneously between the two.

All HSB should be considered in a child protection context.

The DSL and Deputy DSL's should have a good understanding of HSB and ensure that all academy staff have received training at an appropriate level to their role within the academy.

Appendix Four – Online Safety

As our students increasingly use electronic equipment on a daily basis to access the internet, share content and images via social media and for online learning, the school recognises the importance of safeguarding children from potentially harmful and inappropriate online material. There is an effective approach to online safety followed within the school which empowers us to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The school ensures online safety is a running and interrelated theme and considers how online safety is reflected as required in all relevant policies and whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Remote learning

Whilst understanding that remote learning has become a necessity on occasions, in line with our responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the school is committed to doing all that we reasonably can to limit children’s exposure to risks from the school’s IT system. As part of this process, the Trust will ensure the school has appropriate filters and monitoring systems in place.

Appendix Five – Further Reading / Additional Information Sources
(recommended for all Lead and Deputy Designated Safeguarding Leads)

[Keeping Children Safe in Education 2022](#)

[Working together to safeguard children 2018](#)

[Sexual violence and sexual harassment between children in schools and colleges](#)

[Sharing nudes and semi-nudes advice for education settings working with children and young people](#)

[Searching, screening and confiscation advice for schools](#)

[What to do if you're worried a child is being abused](#)

[Mental health and behaviour in schools](#)

[Child sexual exploitation - definition and guide for practitioners](#)

[Lucy Faithfull Foundation Harmful Sexual Behaviour Toolkit](#)

[Contextual Safeguarding Network - Beyond Referrals](#)

[When to call the police - guidance for schools and colleges](#)

[Advice to schools and colleges on gangs and youth violence](#)

[Criminal exploitation of children and vulnerable adults - County Lines](#)

[Safeguarding Practitioners: information sharing advice](#)

[Data Protection Toolkit for Schools](#)

[Relationships and sex education \(RSE\) and health education](#)

[Remote education safeguarding guidance](#)

[Ofsted Inspection Guidance 2022](#)

[Use of Reasonable Force in Schools](#)

[Education Recovery Support](#)

[Equality Act 2010 Guidance](#)

[Please also see Additional advice and support pages within KCSIE 2022 \(pages 153 – 160\)](#)

Appendix Six - Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
 - a. a police officer;
 - b. employed by the police;
 - c. under the direction or control of the chief officer of a police force; or
 - d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

¹ The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

² A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.