

# TRINITY SCHOOL



## Safeguarding and Child Protection Policy

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**This Policy is intended to ensure that the Governors' Vision and Aims are delivered, as set out below:**

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# Safeguarding and Child Protection Policy

This Policy is intended to ensure that the Governors' Vision and Aims are delivered, as set out below:

## Trinity School Vision

- *Leading Excellence in SEND Provision*
- *Ensuring Outstanding Person-Centred Achievement*
- *Including Everyone in Meaningful and Safeguarded Life*

## KEY STAFF

### DESIGNATED SENIOR PERSON FOR CHILD PROTECTION AND SAFEGUARDING

- Lucy Foster – Deputy Head
- In her absence – Kim Case and Jo Long – Deputy Head and Headteacher

### Designated Safeguarding Leads in each Phase

- Denise Norris - Primary & Looked After Pupils
- Sandra Lee – Secondary & Looked After Pupils
- Nicola Johnson – FEC & Looked After Pupils
- Sam Beezley – LLC & Looked After Pupils

### Deputy Designated Safeguarding Leads

Jo Long	Head Teacher
Kim Case	Deputy Head Teacher
Liz Fortt/ Laura Feeney	DSL Administrators
Natasha Bridger	Head of Primary Phase
Amanda Fennell	Primary Manager
Kim Khan	Primary Manager
Ryan Jones	Head of Secondary Phase
Terri Pietersen	Secondary Manager
Yewande Adedipe	Secondary Manager
Katie Denham	Head of Further Education
Jean Williams	FEC Manager
Victoria Oliver	LLC Manager
Pooja Rami	LLC Manager
Mellissa Windross	LLC Deputy Manager
Young Ikubor	LLC Deputy Manager

## NOMINATED GOVERNOR

Glenda Spencer and Ann Jones

## SCHOOL COMMITMENT AND AIMS

Trinity School fully recognises its responsibilities for safeguarding pupils. Our students' welfare and safety are at the heart of our school's ethos and is embedded in everything we do. In accordance with *Working Together to Safeguard Children: 2023*, the school must ensure that appropriate procedures are in place for responding to situations in which they believe that a pupil has been abused or are at risk of abuse, including procedures to cover circumstances in which a member of staff is accused of, or suspected of, abuse.

Abuse is when a pupil is hurt or harmed by another person in a way that causes significant harm, and which may well have an effect on the pupils' development or wellbeing. Significant harm can be caused by one traumatic event or a compilation of events that interrupt, change or damage the pupil's physical or psychological development.

**At Trinity School we are committed to ensure that arrangements are in place to safeguard and promote the welfare of pupils by:**

- maintaining pupils' welfare as our paramount concern and ensuring a school wide culture conducive to this;
- providing an environment in which pupils feel valued and respected, confident to talk openly and sure that they will be listened to, establishing and maintaining an ethos, which is understood by all staff, which enables pupils to feel secure and encourages them to talk knowing that they will be listened to;
- provide across the curriculum, opportunities which equip pupils with the skills they need to stay safe from harm and to know to whom they should turn for help, including opportunities in the PSHE curriculum for pupils to develop the skills they need to recognise and stay safe from abuse;
- ensure that all pupils know there is an adult in the school whom they can approach if they are worried or in difficulty.
- raising the awareness of all teaching, non-teaching staff and volunteers of the need to safeguard pupils through appropriate training and of their responsibilities in identifying and reporting possible cases of abuse;
- encouraging professional curiosity around safeguarding through calm vigilance and robust training
- ensuring all staff are able to recognise and are alert to signs of abuse;
- ensuring all staff know to whom they should report any concerns or suspicions;
- ensuring there is an effective structured procedure in place to be followed by all members of the school community in cases of suspected abuse
- providing a systematic means of monitoring pupils who have been identified as "in need" or at risk of harm;
- keeping confidential records, which are stored securely and shared appropriately with other professionals;
- ensuring procedures are in place for dealing with allegations of abuse against members of staff and volunteers;
- establishing effective joint working relationships with all other agencies, involved in safeguarding pupils ("Working Together to Safeguard Pupils: A guide to inter-agency working to safeguard and promote the welfare of pupils 2018") and that the school contributes effectively to assessments of need and support plans;
- operating safe recruitment procedures and making sure that all appropriate checks are carried out on new staff who work with pupils (see Safe Recruitment Policy);
- ensuring that all adults (including other community users of our facilities) have been checked as to their suitability;

- working with parents/carers to build an understanding of the school's duty to safeguard and promote the welfare of all pupils, including the necessity for child protection policies and procedure, information sharing and work in partnership with other agencies.

## LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance [Keeping Pupils Safe in Education \(2025\)](#) and Working Together to Safeguard Children (2023), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Pupils Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of pupils
- [London Child Protection Procedures 6<sup>th</sup> edition 2020](#) (and amendments), which the schools in London Borough of Barking and Dagenham follow
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with pupils
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to pupils
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with pupils
- This policy also meets requirements relating to safeguarding and welfare in the [Statutory framework for the Early Years Foundation Stage](#)

## KEY DEFINITIONS

- **Safeguarding/Promoting the Welfare of Pupils:**
  - Protecting pupils from maltreatment
  - Preventing impairment of pupils' mental and physical health or development
  - Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care
  - Taking action to enable all pupils to have the best outcomes
- **Child protection** is part of this definition and refers to activities undertaken to prevent pupils suffering, or being likely to suffer, significant harm.

- **Abuse** is a form of maltreatment of a pupil and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- **Neglect** is a form of abuse and is the persistent failure to meet a pupil's basic physical and/or psychological needs, likely to result in the serious impairment of the pupil's health or development. Appendix 1 defines neglect in more detail.
- **Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where pupils share nude or semi-nude images, videos or live streams.
- **'Pupils'** includes everyone under the age of 18. It should be noted that we have pupils aged 18 and 19 in our further education centre.

As our school is a provision for pupils aged 3-19, some of our pupils will be adults. All our pupils, regardless of age, will be covered by this policy and its procedures. In the event that a concern about a pupil who is of adult age is raised, where appropriate the school will liaise with adult social care.

The following 3 **safeguarding partners** are identified in Keeping Pupils Safe in Education (and defined in the Pupils Act 2004, as amended by chapter 2 of the Pupils and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local pupils, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA • The chief officer of police for a police area in the LA area.

## EQUALITY STATEMENT

Some pupils have an increased risk of abuse, and additional barriers can exist for some pupils with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise pupils' diverse circumstances. We ensure that all pupils have the same protection, regardless of any barriers they may face.

We give special consideration to pupils who:

- Have special educational needs (SEN) or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## ROLES AND RESPONSIBILITIES

## **General**

All adults working at Trinity School have a responsibility to safeguard and promote the welfare of our pupils. This includes a responsibility to be alert to possible abuse and to record and report concerns to a designated safeguarding lead. The names of those carrying these responsibilities for the current year are listed at the start of this document. Our policy and procedures also apply to extended school and off-site visits.

## **All Staff**

All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance Keeping Pupils Safe in Education and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including
  - this safeguarding and child protection policy.
  - the staff code of conduct.
  - the role and identity of the designated safeguarding lead (DSL) and deputies.
  - the behaviour policy.
  - the safeguarding response to pupils who go missing from education.
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority pupils' social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a pupil tells them they are being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- How to report concerns regarding a member of staff
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported to keep safe.
- Wider health, safety and well-being protocols that keep the school and our pupils safe.

## **Designated Senior Person for Child Protection**

The designated senior person for child protection will:

- Ensure this policy is updated annually in line with 'Keeping Children Safe in Education' guidance and disseminated to staff, parents and governors.
- Ensure the policies and procedures outlined in this policy are implemented effectively across the school, via training, support, communications, quality assurance and accountability procedures.
- Ensure all DSLs are trained and well supported to respond to all safeguarding concerns and to implement this policy faithfully.
- Review any concerns or inadequacies with safeguarding procedures and take immediate actions to rectify this.
- Report to governors on a termly basis regarding safeguarding and child protection needs, strengths and challenges across the school.
- Keep the headteacher informed of any significant or complex safeguarding issues, related either to individual pupils or procedures, for her oversight.

## **Designated Safeguarding Leads**

Trinity School has trained all senior and extended leaders as designated safeguarding leads. This is to ensure that all staff with significant levels of management responsibility, either at

phase or the whole school level, have appropriate training to recognise and respond to safeguarding and child protection needs.

Each phase of the school will have a DSL who has the day-to-day responsibility for child protection and wider safeguarding. Other managers and senior leaders are there to support, provide a second opinion or perspective, cover absences, and support during periods of increased numbers of incidents.

During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns. During non-term time, named deputies are either present on site or on call when pupils are in school. This cover is organised annually to ensure no gaps in service.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on pupil welfare and pupil protection matters, including whole school training.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of pupils and young people.
- Refer suspected cases, as appropriate, to the relevant body (local authority pupils' social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSLs will also keep the Headteacher informed of any significant issues and liaise with local authority social workers regarding concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description.

### **Headteacher**

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers
  - Are informed of our systems which support safeguarding, including this policy, as part of their induction.
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers via the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

### **Governing Body**

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

All concerns regarding the Headteacher will be directed to the Chair of Governors. In the event that an allegation of abuse is made against the Headteacher, the Chair of Governors will assign

another governor to lead any investigation, with the support of the local authority HR and LADO. This will leave the chair free to consider any case that is escalated to a hearing.

## **CONFIDENTIALITY**

Staff are expected to keep any safeguarding concerns confidential and should only share such information with a DSL or a deputy. Such information must not be shared among general staff or outside of the school (except for relevant external professionals such as social workers and police)

Staff are also made aware that:

- Timely information sharing is essential to effective safeguarding.
- 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 pupils.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping pupils safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of pupils and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a pupil at risk.
- Staff should never promise a pupil that they will not tell anyone about a report of abuse, as this may not be in the pupil's best interests.
- The governments [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information (see Appendix 2).
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

## **SPECIFIC SAFEGUARDING ISSUES**

Please see Appendix 3 for information on the following specific safeguarding issues:

- Child criminal exploitation
- Child Sexual Exploitation (CSE) including trafficking for slavery and sexual practice
- Pupils missing from Education
- Domestic Violence
- Homelessness
- Honour-Based Abuse
  - FGM
  - Forced marriage
- Mental Health
- Online safety and the use of mobile technology
- Child-on-child abuse
- Preventing Radicalisation/Extremism
- Serious violence
- Sexting
- Sexual violence and sexual harassment between pupils in schools

### **Specific Safeguarding Issues**

The school has created individual factsheets for all of the specific safeguarding concerns listed below, these are available for staff from the Designated Safeguarding Leads or on the school intranet with this policy.

- Bullying including cyberbullying
- Child missing from home or care
- Child missing from education

- Child Sexual Exploitation (CSE)
- Domestic Violence
- Drugs
- Fabricated or induced illness
- Faith Abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and Youth Violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental Health
- Missing pupils and adults
- Peer-on-peer abuse
- Private Fostering
- Radicalisation
- Relationship abuse
- Sexting and internet related abuse
- Trafficking

## WHEN TO BE CONCERNED

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding concern.

Concerns for a child or young person may come to the attention of staff in a variety of ways, for example through observation of behaviour, injuries or a disclosure from pupils, family members and members of the public. The following should trigger concern:

- when there is a suspicion that an injury maybe non-accidental
- when there are signs of neglect or inadequate supervision
- when a pupil displays behaviour unusual for that particular pupil, for example - aggression, withdrawal, depression, or demonstration of inappropriate sexual behaviour • when a pupil fails to thrive
- when a pupil discloses abuse, or describes something, which may be associated with abuse (sexual and non-sexual abuse)
- when you are worried about a child/young person for any reason
- ill-fitting equipment (e.g. callipers, sleep board that may cause injury or pain, inappropriate splinting)
- undignified age or culturally inappropriate intimate care practices
- missing from school

This list is not exhaustive, and staff should show professional curiosity in all circumstances that may indicate a safeguarding concern.

Child abuse is defined as:

- **physical abuse**, including female genital mutilation
- **emotional abuse**, including that arising from domestic violence and forced marriage
- **sexual abuse**, including the sexual exploitation associated with child prostitution
- **physical abuse**, where the person with custody, or charged with care of the pupil, causes or knowingly fails to ensure the pupil is safe and thrives

All staff in school should be aware of the definitions and signs and symptoms of abuse (See Appendix 1)

Any pupil with a disability is by definition a 'child in need' under section 17 of the Pupils Act 1989 and disability has been shown to confer an increased level of vulnerability. Studies have shown that disabled pupils are 3.8 times more likely to be neglected, 3.8 times more likely to be physically abused, 3.1 times more likely to be sexually abused and 3.9 times more likely to

be emotionally abused. In addition to the universal indicators of abuse/neglect, in the case of a disabled pupil the following abusive behaviours must also be considered:

- force feeding
- unjustified or excessive physical restraint
- rough handling
- extreme behaviour modification including the deprivation of medication, water, food or clothing, and physical chastisement.
- misuse of medication, sedation, heavy tranquillisation
- invasive procedures against the pupil's will
- deliberate failure to follow medically recommended regimes
- misapplication of programmes or regimes/overmedicalisation

#### **For a non-verbal pupil**

Staff should be looking for signs of the following

- signs of physical abuse, e.g. bruises
- flinching as if frightened of being hit
- a change in behaviours, pupil is withdrawn or over excited
- signs of neglect
- deliberate failure to follow medically recommended regimes
- ill-fitting equipment e.g. callipers, inappropriate splinting

## **RESPONDING TO CONCERNS**

There is no individual discretion allowed to any member of staff who has knowledge or suspicion that a pupil might be at risk of child abuse. In child protection matters, the child protection procedures must be followed at all times. Any knowledge or suspicion the pupil may be at risk (if a pupil is suffering or likely to suffer harm, or in immediate danger) must be reported to the Designated Senior Person for Child Protection immediately, to ensure help and to ensure any intervention necessary to protect the pupil is accessed as early as possible.

Staff will also be shown during annual safeguarding training how to make referral themselves outside of school hours if they cannot contact a DSL. Anyone can make a referral. Staff must tell a DSL as soon as possible if they make a referral directly.

#### **If a pupil makes a disclosure to you**

Ensure that the following guidelines are observed at all times:

1. If a pupil makes a disclosure of abuse allow them to make the disclosure at their own pace and in their own way.
2. Stay calm and do not show that you are shocked or upset. Avoid interrupting except to clarify what the pupil is saying.
3. Do not try to persuade a pupil to talk to you, ask leading questions or probe for information that they do not volunteer.
4. Do not repeatedly ask or modify questions and thus unintentionally indicate that you are pleased with the pupil's disclosure.
5. Tell the pupil they have done the right thing in telling you. Do not tell them they should have told you sooner.
6. Reassure the pupil that they have been heard and explain what you will do next and to whom you will talk.
7. If a pupil wants to show you an injury then try to have another member of staff present.
8. Do not set up a play or role-play situations or make suggestions about how incidents or injuries happened.
9. Remember you cannot promise confidentiality so do not make promises that any disclosure will be a secret between you and a pupil.

10. Inform the Designated Senior Person for Child Protection as soon as possible. Write up your conversation as soon as possible on a green form in the pupil's own words. Stick to the facts, and do not put your own judgement on it.
11. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process, such as social services and police.

## PROCEDURES

Refer any concerns or suspicions of a safeguarding/child protection issue **immediately** to the Designated Senior Person for Child Protection or in their absence their deputy.

- Complete a written referral on CPOMs or a 'Record of Concern' form. Copies of this form are available from outside the main school office.
- Complete the referral fully and thoroughly, including all information and observations, using objective, factual and de-personalised language. Do not include any speculations.
- Where there is suspicious bruising or other physical injuries mark on the outline body map the size and location of any injury on page 2.
- If you have completed a green form, it **MUST** be handed to:
  - A DSL or their deputy
  - Liz Fortt or Laura Feeney
  - It must not be left on a desk, in a pigeonhole or with someone who is not a DSL.

## NOTIFYING PARENTS

Where appropriate, we will discuss any concerns about a pupil with the pupil's parents/carers. The DSL will normally do this in the event of a concern or disclosure. A member of SLT may also support with this process.

Other staff will only talk to parents/carers about any such concerns following consultation with the DSL.

Staff may refrain from informing parents/carers immediately of an allegation or suspicion of abuse if they believe that it may place the pupil at further risk of harm. If we believe that notifying the parents/carers would increase the risk to the pupil, we will discuss this with the local authority social care team before doing so.

In the case of allegations of abuse made against other pupils, we will normally notify the parents/carers of all the pupils involved, subject to advice from social care and the police.

## REFERRALS TO SOCIAL SERVICES

It is the responsibility of the phase DSL to decide when to make a referral to the Social Services. The phase DSL has a responsibility to refer a pupil to Social Services when it is believed or suspected that the pupil:

- has suffered significant harm
- is likely to suffer significant harm

To help with the decision of whether or not to make a referral she/he can consult with the Head Teacher/Deputy Head Teacher/other DSLs. As standard we will always call the Multi Agency Referral Hub (MASH) for advice before submitting a multi-agency referral form (MARF).

Where there are concerns about the immediate safety of a child or young person a referral will be made immediately by telephone to MASH.

Some concerns may need to be monitored over a period of time before a decision to refer to Social Services is made.

In all but the most exceptional cases parents/carers will be made aware of the concerns felt for a child or young person at the earliest possible stage.

If a child or young person is referred, the Designated Senior Person for Child Protection will ensure that the Headteacher and other relevant staff are informed of this. This will be done either in person or via CPOMs or email.

If, after consultation with the Designated Senior Person for Child Protection, a member of staff feels that appropriate action is not being taken in respect of his or her concerns for a pupil s/he should speak to the Head or Deputy Heads immediately to share their concerns, who will take this seriously and immediately review the situation and the decisions taken. Staff are free to make referrals themselves to social care, but we would always encourage staff to share concerns with us first, to ensure school oversight and avoid impairing relationships with parents/carers.

## **PUPILS SUBJECT TO CHILD PROTECTION AND CHILD IN NEED PLANNING**

The DSL for the phase will inform key members of staff which pupils are subject to child protection or child in need planning. These pupils and young persons must be monitored very carefully, and all concern should be recorded on CPOMS and passed immediately to the Designated Safeguarding Lead for the phase.

The DSL/Access and Attendance lead will notify the designated social worker if a pupil who is subject to a Child Protection Plan/Child in Need Plan is:

- absent without explanation and where we cannot contact their parent/carer
- have concerns about the reason given for the absence
- showing poor general attendance and arrival/collection times

The pupil administrator will produce daily absence figures for pupils subject to Child Protection Plan/Child in Need Plan and this will be shared with DSLs and Access and Attendance Leads.

The school will ensure attendance at all strategy, core group and conferences meetings for such pupils.

## **LOOKED-AFTER AND PREVIOUSLY LOOKED-AFTER PUPILS**

We will ensure that:

- Appropriate staff have relevant information about pupils looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The phase DSLs have details of pupils' social workers and relevant virtual school heads.

Lucy Foster is named as the designated teacher for the school who is responsible for promoting the educational achievement of looked-after pupils and previously looked-after pupils in line with [statutory guidance](#). She will have an overview of the support for LAC pupils and the school's regard for the necessary LAC procedures. The lead DSLs in each phase act as deputies for the LAC pupils in their phases and will attend meetings and respond directly to social workers, the virtual school and families.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after pupils are quickly and effectively responded to.
- Work with DSLs and the Virtual School to promote the educational achievement of looked-after and previously looked-after pupils, including discussing how pupil premium plus funding can be best used to support looked-after pupils and meet the needs identified in their personal education plans.

The school will work with social care and the virtual school to support our pupils at all stages of their transition into care. This will include:

- Sharing key information about the pupil with professionals, such as behavioural, wellbeing, communication and educational needs
- Help prepare pupils for any transitions through the use of social stories, visuals, timetables, etc.
- Provide resources and advice to those who come to care for the pupil, such as work and regulation tasks, social stories, communication systems and resources, etc.
- Ensure that their wellbeing at school is accounted for, by providing stability, personalised behaviour and wellbeing support, an adapted timetable if necessary, and referral to additional services such as CAHMS.
- Share any concerns with relevant professionals in a timely manner.

## **RECORDS AND MONITORING**

Staff can play a vital role in helping pupils in need or at risk by effective monitoring and record keeping. Any incident or behavioural change in a child or young person that gives cause for concern should be recorded on CPOMS or a Record of Concern form, copies of which are kept in the pupil's safeguarding records.

It is important that records are factual, objective and reflect the words used by the child or young person. They should be free from speculation and opinion should not be given unless there is some form of evidence base, which can also be quoted. Records must be signed and dated with timings if appropriate. It is important to remember that any issues are confidential, and staff will be party to the issues on a 'need to know' basis. This will be judged against the Seven Golden Rules for Information Sharing (See Appendix 2)

Safeguarding records are securely stored in separate locked filing cabinets within the safeguarding office and with access confined to specific staff, i.e. the Designated Senior Persons for Child Protection and Deputies.

All DSLs are responsible for such records and for deciding at what point these records should be passed over to other agencies. Any transfer of such records to other settings and agencies will be done safely and securely. The Data Protection Officer, Sandra Lee, will support this process.

## **RETENTION OF SAFEGUARDING RECORDS**

This follows the guidance from Information and Records Management Society (IRMS) 2019; Department of Education, 2016; Department for Education (DfE), 2021, LBBB Records Management Policy, 2018.

Child Protection files are passed on to any new school a pupil attends separate to any other paperwork for that pupil and marked for the attention of the Designated Safeguarding Lead. This should where possible be within 5 days of being informed of the new school.

Safeguarding files should be kept for the following length of time:

- In England the file should be kept until the pupil reaches their 25<sup>th</sup> birthday.
- Some records are subject to statutory requirements and have a specific retention period. This includes records relating to pupils who have been 'looked after' by the local authority – until the pupil's 75<sup>th</sup> birthday.
- Where a record relates to concerns about an adult who works or volunteers at the school regarding a pupil, the records should be kept in their personal file until they have reached normal retirement age or for 10 years, whichever is longest.
- If a concern relates to a member of staff and their own pupils, the record will be kept on their personal file for only as long as necessary or as a note to say what support was offered to the staff member.
- Where there are legal proceedings, it is best to seek legal advice about how long to retain your records.

In the following cases, records should be kept for longer periods:

- the records provide information about a pupil's personal history, which they might want to access at a later date.
- the records have been maintained for the purposes of research.
- the information in the records is relevant to legal action that has been started but not finished
- the records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation).
- organisations must keep any records that could be needed by an official inquiry (for example the Independent Inquiry into Child Sexual Abuse (IICSA) (IICSA, 2018)). Inquiries will issue directions for records to be retained, and these must be followed.

The DSL Admin will ensure the following when pupil's leave the school and/or move:

- complete records are sent on to the receiving school, whether a pupil changes as a natural progression or for any other reason
- any remaining paper files that need to be transferred will be sent via recorded delivery. A copy will be retained by the school. Our aim is to move to a completely online system of record management and sharing where possible.
- accurate information is collected and shared with other agencies including the statutory or voluntary organisations with whom families have contact
- that their counterparts in the receiving authority have been sent a copy of all relevant records within five days of being notified of the move of the pupil
- relevant records are requested from their counterparts in originating authorities when notified of a move into the school
- informing local social care and the Education Health Care Team of proposed or actual changes of school where pupils are currently known to social care
- child protection material, is transferred separately from a pupil's main school records and direct to the relevant member of staff in the receiving school, with any necessary discussion or explanation.
- Trinity will request a receipt for this to confirm safe arrival and will store this receipt as proof, to include date of transfer of sensitive files and the name of the person to whom they are transferred.

## **TRAINING**

### **New Staff**

All staff members will undertake child protection and safeguarding training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding

systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated to reflect current policies and guidance.

At induction training all staff will receive a copy of this policy and 'Keeping Pupils Safe in Education' Part 1.

### **All Staff**

All staff are expected to attend an annual refresher on child protection and safeguarding, as well as any additional training to reflect national or local concerns.

There will be additional training in the spring and summer term around a particular safeguarding focus.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates via Safeguarding Matters an in-house update sent out during term time.

All staff will be informed when the Child Protection and Safeguarding Policy is updated and where to access the policy.

Agency workers, volunteers, student placements and new staff will be given a brief safeguarding overview during their first week in school. This will take place every Tuesday morning and be arranged and conducted by Liz Fortt.

All visitors, agency staff, volunteers and student placements will be given a leaflet explaining the school's safeguarding procedures on arrival at reception.

### **DSLs and Deputies**

The DSLs and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent Awareness training.

An in-house guidebook called 'Trinity DSL Handbook' is given to all newly trained DSLs.

### **Governors**

All governors will receive training about safeguarding annually, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. This will include training on the school's policy and procedures, as well as training designed specifically for Governors with responsibility for safeguarding.

## **ALLEGATIONS OF ABUSE AGAINST TEACHING AND NON-TEACHING STAFF**

Trinity school assumes that abuse can happen anywhere, including our school. It is essential that staff members come forward immediately if they have concerns about the treatment of pupils. We must remember that we have a duty of care to our pupils and a legal responsibility to report any concerns of abuse or maltreatment.

We must hold staff members to the same level of calm vigilance that we do parents, carers, visitors, etc. We cannot assume that because staff work here that they would never hurt a pupil. No one is exempt from accountability, regardless of their position within the school.

### **The safety of our pupils is paramount at all times.**

If suspicions of abuse relate to any member of the school's staff or volunteer, they must be reported to the Headteacher, Jo Long, or in her absence, Lucy Foster or Kim Case, Deputy Heads.

If suspicions of abuse, relate to a Designated Person for Child Protection, they should be reported directly to the Headteacher, Jo Long, or in her absence, Lucy Foster or Kim Case, Deputy Heads.

The Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO).

If suspicions of abuse relate to the Headteacher, they must be reported to the Chair of Governors who will in turn consult with the Local Authority Designated Officer (LADO). The Chair of Governors can be contacted via the HR office.

Further information regarding the procedure for managing situations involving members of staff can be found in Guidance on Disciplinary Procedures. This can be found on the shared area under 'Policies Guidance and Procedures'.

## **Low Level Concerns**

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with pupils
- having favourites
- taking photographs of pupils on their mobile phone, contrary to school policy
- engaging with a pupil on a one-to-one basis in a secluded area or behind a closed door
- humiliating pupils
- inappropriate physical interventions or forms of punishment that are not agreed in the behaviour policy
- shouting at or aggressive behaviour towards pupils with challenging behaviour

The school will take all low levels concerns seriously as part of our wider safeguarding procedures. It is crucial that all low-level concerns are shared responsibly with a member of SLT (Head, Deputy Heads and Head of Phase). Staff must report any concern regarding staff behaviour, even if it feels small or insignificant, or they are not quite sure. We work to the premise that if something doesn't feel right, it is usually for a good reason.

We ask our staff to trust their instincts and speak promptly to a member of SLT. Staff should be assured that they will consider all evidence available before making any decisions, and the response to staff will be proportionate to the concern raised.

We aim to deal with low level concerns at an early stage to give staff the best chance to learn and correct unprofessional behaviour. Ensuring they are dealt with effectively should also

protect those working in or on behalf of the school from becoming the subject of potential false low-level concerns or misunderstandings.

If we are in any doubt as to whether the concern about a member of staff in fact meets the harm threshold, we will consult with the LADO.

In the event that a low-level concern is raised, the Head/Deputies/HOP will:

- Consider the concern in full, using all available evidence and considering any relevant past concerns.
- Respond to the individual involved. This could include informal advice, training, mentoring and sign posting to support services. It may also involve further disciplinary procedures.
- Support the person who made the disclosure by offering reassurance and sign posting any support services needed.
- Record the concern in writing. The record should include details of the concern, the context in which the concern arose, and the action taken and the rationale for it. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. This will be kept securely on the staff member's personal file and maintained for as long as they are employed at the school.
- Monitor for patterns of behaviour and consider further actions or consult with the LADO if this becomes concerning.
- Look at wider culture of the school to see if there are issues that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

The staff Code of Conduct will be updated and shared annual and will make clear reference to low level concerns. Staff will be taken through the Code of Conduct in detail at Induction. The SLT and phase managers will continue to uphold all elements of the Code of Practise and support staff to have regard for this through reminders and support.

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

## **WHISTLEBLOWING**

We recognise that pupils and young people 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 attitudes or actions of colleagues. The school has adopted the London Borough of Barking and Dagenham Whistle Blowing policy, a copy of which is on the shared area under 'Policies Guidance and Procedures'.

Staff can use this policy to raise concerns with the local authority if they feel any impropriety or inaction is taking place in the school in relation to safeguarding and child protection procedures.

## **STAFF CODE OF CONDUCT**

Staff must have regard for the school's Code of Conduct at all times, as part of our wider safeguarding procedures. All school staff should take care not to place themselves in a vulnerable position in relation to child protection.

The following are key points for staff to remember but this list is not exhaustive.

- It is always advisable for interviews or work with individual pupils or parents to be conducted in view of other adults or to ensure that another appropriate adult is in the vicinity and is aware of the task being undertaken.
- Staff are not permitted to fully cover the glass panels on their doors. If some cover is needed, a gap must be left so that someone is able to look into the room.
- Staff may change a pupil by themselves, if necessary, but it is best practise to do this with other staff members supporting or being in close vicinity where possible. Staff must follow the intimate care policy when changing pupils.
- Staff should refrain from being overly affectionate with pupils and keep professional boundaries at all times. However, we recognise that our pupils may need comfort and sensory approaches to supporting their behaviour and wellbeing. This should be documented on a touch protocol and agreed with the Head of School.
- Staff have a responsibility to follow health and safety protocols to ensure a safe environment for our pupils at all times. This includes close supervision, reporting site issues, ensure the security of the site and using dynamic risk assessments across the day.
- Staff must have regard for the behaviour policy and its related protocols, particularly around the use of physical interventions and emergency secure spaces.

All school staff should work towards providing an environment and atmosphere for pupils and young people to enable them to feel safe to communicate. However, staff must never promise a pupil to keep certain information confidential. It must be explained that staff have certain duties to help keep that pupil safe, which may involve informing others.

## **RECRUITMENT AND SELECTION OF STAFF**

A separate policy ('Schools Safer Recruitment Policy and Selection Policy') will detail how we ensure recruitment is safe and complies with the requirements of Keeping Pupils Safe in Education, 2022.

Our recruitment procedures acknowledge our responsibilities for protecting pupils from unsuitable people through safe recruitment practices. This policy is based on the local authority policy but also includes important additions that are specific to the school's ethos and practice.

## **PHYSICAL INTERVENTION/POSITIVE HANDLING**

Specific guidance on physical intervention/positive handling by staff is set out separately, as part of our Behaviour Policy. This Policy states that staff must only ever use physical intervention as a last resort, e.g., when a pupil is endangering him/herself or others or causing substantial property damage and that, at all times it must be the minimal force necessary to prevent injury to another person.

The school uses Team Teach to train staff in de-escalation strategies and safe use of approved physical intervention when necessary. Such events should be recorded making use of the school's physical intervention record form and signed by a witness. This record is checked by both the Deputy Headteacher and the Designated Senior Person for Child Protection. Parents/carers are informed of all physical interventions. All pupils with an allocated social worker are also informed of any physical intervention needed and the reasons why this happened.

Staff who are likely to need to use physical intervention will be appropriately trained and supported by our own in house qualified trainers. These trainers will renew their qualification annually.

We understand that physical intervention, of a nature which causes injury or distress to a pupil, may be considered under child protection or disciplinary procedures.

## HEALTH AND SAFETY

Our Health & Safety policies, set out in separate documents, reflect the consideration we give to the protection of our pupils both physically within the school environment and, for example, in relation to internet use, and when away from the school when undertaking school trips and visits. This includes, but is not limited to:

- Site security and lockdown protocols
- Staff being able to challenge anyone onsite who they do not believe is involved in legitimate activity
- The use of dynamic risk assessments to respond to urgent issues.
- Safe and effective supervision of pupils at all times, taking into account their complex needs and learning difficulties.
- Safe procedures around medical interventions and the storage of medication onsite. Having a safe number of first aiders onsite to support accidents and injuries.
- Staff not bringing or storing unsafe items in classrooms or in other accessible places onsite, e.g. scissors and other sharp objects, kettles and heated objects, small items that can be swallowed, poisonous items, etc.
- Standardised procedures and management oversight of all trips and offsite activities.

Staff receive annual training about Health and Safety, and this includes our duty of care to our pupils and the steps we need to take to keep them safe while onsite.

## ONLINE SAFETY

The school recognises its duty to keep pupils safe while accessing online content. We take the following steps to ensure this.

- No pupil is allowed access to the internet without staff supervision. Any access to inappropriate material is stopped and reported to the head of phase and the IT team. Parents/carers will also be informed.
- Training for staff on the safe use of technology in school, along with understanding the key issues and content that our pupil may find online.
- All IT equipment in the school is subject to borough filters to prevent access to inappropriate material. The IT team work closely with our network provider to ensure this and respond to any concerns.
- The school has completed government self-assessment toolkit to ensure we meet the digital and technology standards. <https://www.gov.uk/guidance/meeting-digitalandtechnology-standards-in-schools-and-colleges>.
- Our curriculum includes teaching pupils how to safely access IT and the inappropriate material and themes they may come across. This includes:
  - Online grooming and safety when speaking to others.
  - The sharing of personal information that could be used to locate a pupil, steal their identity and access their finances.
  - Pornographic material and the risk of CSE.
  - Violent, discriminatory and radicalising material, CCE.
  - Harmful health material such as pro anorexia and suicide ideation content.
  - Cyberbullying.
  - Gambling, phishing and online scams.
  - How to report a concern to an adult for support.
- Supporting parents/carers to add safety filters to devices at home, through information sharing and direct support.

- Any FEC pupils who bring mobile phones to school will be required to check them in with the management team at the start of the day. Phones must be switched off before they are handed in. This ensures pupils do not have free access to their phones during the school day.
- Smart watches and other wearable technology with communication, internet, or recording capabilities are not permitted in classrooms. These devices must also be switched off and handed in to the management team at the start of the day.
- The only exception to this rule applies to mobile devices or wearable technology that are required to support a pupil's self-management of medical needs, such as those used to monitor and manage diabetes via approved medical apps. In these cases, the device must be used solely for medical purposes and as outlined in the pupil's health care plan.

## Visitors

All visitors to the school site must check in via reception. Staff must make sure all visitors are disclosed to their phase team and reception staff. On arrivals all staff must log using the computerised system and an ID badge will be given to them.

We use a coloured lanyard system to indicate who has been DBS checked and who hasn't. Anyone without a DBS check must be supervised at all times while onsite. Staff are encouraged to politely challenge anyone onsite who is wearing a red lanyard and is unsupervised, as well as anyone who raises concerns or does not appear to be engaged in legitimate activity. Staff should report any concerns immediately to a member of SLT or the front office if someone cannot be found.

Please see the table below.

		<b>Lanyard</b>
		<b>Colours</b>
<b>Permanent Staff Kitchen Staff</b>	<b>DBS Checked - Yes</b>	<b>Black</b>
<b>Agency Staff</b>	<b>DBS Checked - Yes</b>	<b>Green</b>
<b>Tracie Bishop – OT Stephanie Clarke – Physio Steve Dryden – Physio Assistant</b>	<b>DBS Checked - Yes</b>	<b>Green</b>
<b>Student Placements</b>	<b>DBS Checked - Yes</b>	<b>Green</b>
<b>Governors</b>	<b>DBS Checked - Yes</b>	<b>Yellow/Orange</b>
<b>Parents/Carers</b>	<b>DBS Checked - No</b>	<b>Red</b>
<b>Contractors</b>	<b>DBS Checked - No</b>	<b>Red</b>

All other visitors	DBS Checked - No	Red
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## **ANTI-BULLYING/COMPLEX BEHAVIOUR**

Our policy on the prevention and management of bullying is set out in our Bullying Policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

## **RACIST INCIDENTS**

Our policy on racist incidents is set out in our Anti Racism Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

## **ATTENDANCE/PUPILS MISSING FROM EDUCATION**

Attendance is an important part of safeguarding. It is essential that we know where pupils are if they are not in school when expected. Our attendance policy will cover our procedures in further detail.

Attendance leads in each phase will ensure oversight and timely action where attendance becomes a concern for a pupil. This includes but is not limited to:

- An unexplained absence, not able to contact families – the leads will complete a home visit to ascertain if a pupil is safe
- Patterns and repeating absences – the leads will liaise with the local authority attendance lead for support and advice
- Pupils not in school for periods of time (due to illness, etc.) – leads will complete welfare calls with families to check on pupil safety and wellbeing.
- Pupils who are moving to another provision, not attending school and are still on roll –
  - the leads will complete welfare calls to families where we have contact details
  - the leads will liaise with the current and receiving local authority if there is a communication breakdown with the family

## **SUPERVISION AND SUPPORT**

We acknowledge that safeguarding and child protection can be highly emotive and a large responsibility for all concerned. Any member of staff affected by issues arising from concerns for pupils' welfare or safety can seek support from a DSL or anyone from the senior leadership team. The DSL can put staff and parents/carers in touch with outside agencies for professional support if they so wish.

## **MONITORING AND REVIEW**

The school will complete the borough bi-annual review of school safeguarding procedures. This will be a working document and will be updated in stages in between the bi-annual submission to the borough.

A safeguarding checklist will also be sent out annually to all schoolteachers. This will be completed with their class team. The data from this will be analysed and actions taken by SLT to address any emerging gaps in knowledge or practise.

All school personnel and Governors will have a copy of this policy which will be reviewed annually.

The Head and Deputy Heads will report termly to Governors on safeguarding progress and issues, so that Governors maintain an oversight of school procedures and their effectiveness and are able to support and challenge where needed.

**If you are in doubt about any aspect of child protection procedure, please ask for advice from SLT or a DSL.**

## Appendix 1

### **CONCEPT OF SIGNIFICANT HARM**

Some pupils are in need because they are suffering, or likely to suffer, significant harm. The Pupils Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of pupils, and gives local authorities

a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a pupil who is suffering, or likely to suffer, significant harm.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements.

Each of these elements has been associated with more severe effects on the pupil, and / or relatively greater difficulty in helping the pupil overcome the adverse impact of the maltreatment.

Sometimes, a single traumatic event may constitute significant harm (e.g. a violent assault, suffocation or poisoning). More often, significant harm is a compilation of significant events, both acute and longstanding, which interrupt, change or damage the pupil's physical and psychological development

Some pupils live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term neglect, emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm.

### **PHYSICAL ABUSE**

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a pupil.

Physical harm may also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a pupil

### **EMOTIONAL ABUSE**

Emotional abuse is the persistent emotional maltreatment of a pupil such as to cause severe and persistent effects on the pupil's emotional development,

Emotional abuse may involve:

Conveying to pupils that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;

Imposing age or developmentally inappropriate expectations on pupils. These may include interactions that are beyond the pupil's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the pupil participating in normal social interaction;

Seeing or hearing the ill-treatment of another;

Serious bullying, causing pupils frequently to feel frightened or in danger, or the exploitation or corruption of pupils;

Exploiting and corrupting pupils.

Some level of emotional abuse is involved in all types of maltreatment of a pupil, though it may occur alone.

### **SEXUAL ABUSE**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the pupil is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or nonpenetrative acts.

Sexual abuse includes abuse of pupils through sexual exploitation. Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of similar age, consenting partners is not usual. However, where a pupil is under the age of 13 it is classified as rape under s5 Sexual Offences Act 2003. See section 5.23. ICT-based forms of abuse, section 5.39. Sexually active pupils and section 5.40. Sexually exploited pupils.

Sexual abuse includes non-contact activities, such as involving pupils in looking at, or in the production of pornographic materials, watching sexual activities or encouraging pupils to behave in sexually inappropriate ways.

## **NEGLECT**

Neglect is the persistent failure to meet a pupil's basic physical and / or psychological needs, likely to result in the serious impairment of the pupil's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a pupil is born, neglect may involve a parent failing to:

Provide adequate food, clothing and shelter (including exclusion from home or abandonment);  
Protect a pupil from physical and emotional harm or danger;  
Ensure adequate supervision (including the use of inadequate care-givers); Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a pupil's basic emotional needs.

## **RECOGNITION OF ABUSE AND NEGLECT**

The factors described below are frequently found in cases of child abuse or neglect. Their presence is not proof that abuse has occurred, but:

Must be regarded as indicators of the possibility of significant harm;  
Indicates a need for careful assessment and discussion with the agency's nominated child protection person;  
May require consultation with and/or referral to the LA pupils' social care and / or the police.

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the pupil may:

Appear frightened of the parent;  
Act in a way that is inappropriate to their age and development.

The parent may:

- Persistently avoid routine pupil health services and/or treatment when the pupil is ill;
- Have unrealistic expectations of the pupil;
- Frequently complain about / to the pupil and may fail to provide attention or praise (high criticism / low warmth environment);
- Be absent or leave the pupil with inappropriate carers;
- Have mental health problems which they do not appear to be managing;
- Be misusing substances;
- Persistently refuse to allow access on home visits;
- Persistently avoid contact with services or delay the start or continuation of treatment;
- Be involved in domestic violence;
- Fail to ensure the pupil receives an appropriate education.

Professionals should be aware of the potential risk of harm to pupils when individuals (adults or pupils), previously known or suspected to have abused pupils, move into the household.

## **RECOGNIZING PHYSICAL ABUSE**

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury;
- Several different explanations provided for an injury;
- Unexplained delay in seeking treatment;
- The parent/s are uninterested or undisturbed by an accident or injury;
- Parents are absent without good reason when their pupil is presented for treatment;
- Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury);
- Frequent use of different doctors and accident and emergency departments;
- Reluctance to give information or mention previous injuries.

## **BRUISING**

Pupils can have accidental bruising, but the following must be considered as indicators of harm unless there is evidence or an adequate explanation provided. Only a paediatric view around such explanations will be sufficient to dispel concerns listed below:

- Any bruising to a pre-crawling or pre-walking baby;
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding;
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive);
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally;
- Variation in colour possibly indicating injuries caused at different times;
- The outline of an object used (e.g. belt marks, handprints or a hairbrush);
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting;
- Bruising around the face;
- Grasp marks on small pupils;
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse.

## **BITE MARKS**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

## **BURNS AND SCALDS**

It can be difficult to distinguish between accidental and non-accidental burns and scalds and will always require experienced medical opinion. Any burn with a clear outline may be suspicious, e.g.:

Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine);

Linear burns from hot metal rods or electrical fire elements;

Burns of uniform depth over a large area;

Scalds that have a line indicating immersion or poured liquid (a pupil getting into hot water of its own accord will struggle to get out and cause splash marks);

Old scars indicating previous burns / scalds which did not have appropriate treatment or adequate explanation.

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

## **FRACTURES**

Fractures may cause pain, swelling and discolouration over a bone or joint, and loss of function in the limb or joint.

Non-mobile pupils rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type;
- There are associated old fractures;
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement;
- There is an unexplained fracture in the first year of life.

## **SCARS**

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## **RECOGNIZING EMOTIONAL ABUSE**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical.

The indicators of emotional abuse are often also associated with other forms of abuse. Professionals should therefore be aware that emotional abuse might also indicate the presence of other kinds of abuse.

The following may be indicators of emotional abuse:

- Developmental delay;
- Abnormal attachment between a pupil and parent (e.g. anxious, indiscriminate or no attachment);
- Indiscriminate attachment or failure to attach;
- Aggressive behaviour towards others;
- Appeasing behaviour towards others;
- Scapegoated within the family;
- Frozen watchfulness, particularly in pre-school pupils;
- Low self-esteem and lack of confidence;
- Withdrawn or seen as a 'loner' – difficulty relating to others.

## **RECOGNIZING SEXUAL ABUSE**

Sexual abuse can be very difficult to recognise and reporting sexual abuse can be an extremely traumatic experience for a pupil. Therefore, both identification and disclosure rates are deceptively low.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and / or fear. According to a recent study<sup>36</sup> three-quarters (72%) of sexually abused pupils did not tell anyone about the abuse at the time. Twenty-seven percent of the pupils told someone later, and around a third (31%) still had not told anyone about their experience/s by early adulthood.

If a pupil makes an allegation of sexual abuse, it is very important that they are taken seriously. Allegations can often initially be indirect as the pupil tests the professional's response. There may be no physical signs and indications are likely to be emotional / behavioural.

Behavioural indicators which may help professionals identify child sexual abuse include:

- Inappropriate sexualised conduct;

- Sexually explicit behaviour, play or conversation, inappropriate to the pupil's age;
- Contact or non-contact sexually harmful behaviour;
- Continual and inappropriate or excessive masturbation;
- Self-harm (including eating disorder), self-mutilation and suicide attempts;
- Involvement in sexual exploitation or indiscriminate choice of sexual partners;
- An anxious unwillingness to remove clothes for e.g. sports events (but this may be related to cultural norms or physical difficulties).

Physical indicators associated with child sexual abuse include:

- Pain or itching of genital area;
- Blood on underclothes;
- Pregnancy in a pupil;

Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Sex offenders have no common profile, and it is important for professionals to avoid attaching any significance to stereotypes around their background or behaviour. While media interest often focuses on 'stranger danger', research indicates that as much as 80 per cent of sexual offending occurs in the context of a known relationship, either family, acquaintance or colleague<sup>37</sup>.

### **RECOGNIZING NEGLECT**

It is rare that an isolated incident will lead to agencies becoming involved with a neglectful family. Evidence of neglect is built up over a period of time. Professionals should therefore compile a chronology and discuss concerns with any other agencies which may be involved with the family, to establish whether seemingly minor incidents are in fact part of a wider pattern of neglectful parenting.

When working in areas where poverty and deprivation are commonplace professionals may become desensitised to some of the indicators of neglect. These include:

- Failure by parents or carers to meet essential physical needs (e.g. adequate or appropriate food, clothes, warmth, hygiene and medical or dental care);
- Failure by parents or carers to meet essential emotional needs (e.g. to feel loved and valued, to live in a safe, predictable home environment);
- A pupil seen to be listless, apathetic and unresponsive with no apparent medical cause;
- Failure of pupil to grow within normal expected pattern, with accompanying weight loss;
- Pupil thrives away from home environment;
- Pupil frequently absent from school;
- Pupil left with inappropriate carers (e.g. too young, complete strangers);
- Pupil left with adults who are intoxicated or violent; • Pupil abandoned or left alone for excessive periods.


Disabled pupils and young people can be particularly vulnerable to neglect

Although neglect can be perpetrated consciously as an abusive act by a parent, it is rarely an act of deliberate cruelty. Neglect is usually defined as an omission of care by the pupil's parent, often due to one or more unmet needs of their own. These could include domestic violence (see section 5.11), mental health issues (see section 5.29), learning disabilities (see section 5.30), substance misuse (see section 5.31), or social isolation / exclusion (see section 5.1.1 to 5.1.4), this list is not exhaustive.

While offering support and services to these parents, it is crucial that professionals maintain a clear focus on the needs of the pupil.

# SIGNS AND INDICATORS

Neglect	Emotional	Physical	Sexual
<ul style="list-style-type: none"> <li>• Tired/listless</li> <li>• Unkempt</li> <li>• Poor hygiene</li> <li>• Untreated medical conditions</li> <li>• Medical appointments missed</li> <li>• Constantly hungry or stealing food</li> <li>• Over eats when food is available</li> <li>• Poor growth</li> <li>• Poor/late attendance</li> <li>• Being regularly left alone or unsupervised</li> <li>• Dressed inappropriately for the weather condition</li> <li>• Having few friends and/or being withdrawn</li> <li>• Ill equipped for school</li> </ul>	<ul style="list-style-type: none"> <li>• Failure to thrive</li> <li>• Attention seeking</li> <li>• Over ready to relate to others</li> <li>• Low self esteem</li> <li>• Apathy</li> <li>• Depression/self harm</li> <li>• Drink/drug/solvent abuse</li> <li>• Persistently being over protective</li> <li>• Constantly shouting at, threatening or demeaning a child</li> <li>• Withholding love and affection</li> <li>• Regularly humiliating a child</li> </ul>	<ul style="list-style-type: none"> <li>• Unexplained injuries</li> <li>• Injuries on certain parts of the body</li> <li>• Injuries in various stages of healing</li> <li>• Injuries that reflect an article used</li> <li>• Flinching when approached</li> <li>• Reluctant to change</li> <li>• Crying/ instability</li> <li>• Afraid of home</li> <li>• Behavioural extremes</li> <li>• Apathy/depression</li> <li>• Wanting arms and legs covered even in very hot weather</li> </ul>	<ul style="list-style-type: none"> <li>• Age inappropriate sexual behaviour/knowledge/ promiscuity</li> <li>• Wary of adults/ running away from home</li> <li>• Eating disorders/depression/ self harm</li> <li>• Unexplained gifts/ money</li> <li>• Stomach pains when walking or sitting</li> <li>• Bedwetting</li> <li>• Recurrent genital discharge</li> <li>• Sexually transmitted diseases</li> </ul>



## APPENDIX 2

### **SEVEN GOLDEN RULES FOR SHARING INFORMATION**

Information sharing Advice for practitioners providing safeguarding services to pupils, young people, parents and carers July 2018

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## APPENDIX 3

### **Child Criminal Exploitation**

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and pupils or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing

- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's pupils's social care team and the police, if appropriate.

### **Child Sexual Exploitation (CSE) including trafficking for slavery and sexual practice**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and pupils or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Pupils or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

The borough has an **Anti-Exploitation Lead** (formally known as CSE Champion) and

### **Pupils Missing from Education**

All pupils, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

It is the duty of all parents/carers to inform the school of any absence on the first day following the school Attendance Policy. Office Staff will contact parents/carers who do not contact the school and inform the Designated Safeguarding Lead.

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage,

Any pupils who go missing should be reported to the Designated Safeguarding Lead to take appropriate action, following the guidelines in the school Attendance Policy

## **Domestic Violence**

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 pupils, 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. Under the statutory definition, 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 to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on pupils.

All pupils 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 can have a serious, long lasting emotional and psychological impact on pupils. In some cases, a pupil 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 child-on-child 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.

## **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 pupils. The system ensures that when the police are called to an incident of domestic abuse, where there are pupils in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy)) in school before the child or pupils arrive at school the following day. This ensures that the school has up to date relevant information about the pupil’s circumstances and can enable immediate support to be put in place, according to the pupil’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority pupils’ social care if they are concerned about a pupil’s welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about pupils who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate)

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a pupil’s welfare. The DSLs are aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity where appropriate. Where a pupil has been harmed or is at risk of harm, the DSL will also make a referral to pupils’ social care.

## Honour-Based Abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a pupil being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

## FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to pupils affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other pupils about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **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 to coerce a person into marriage. Schools and colleges can play an important role in safeguarding pupils from forced marriage.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Mental Health**

Where pupils 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 pupils' experiences, can impact on their mental health, behaviour, and education.

If you have a mental health concern about a pupil that is also a safeguarding concern, staff are expected to follow school procedures using CPOMS or a Record of Concern form and to share with a DSL immediately.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

### **Online Safety and the Use of Mobile Technology**

We recognise the importance of safeguarding pupils from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as pupils 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, such as making, sending and receiving explicit images (e.g. consensual and nonconsensual 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
- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Explain the sanctions/steps we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit pupils' exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website

### **Child on Child Abuse**

Child on Child abuse is when pupils abuse other pupils. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, 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 nudes and semi nudes' images and/or videos (also known as sexting or youth produced sexual imagery)
- Up skirting, 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
- 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)

Where pupils abuse their peers online, this can take the form of, for example, 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 don't want to receive such content.

If staff have any concerns about peer-on-peer abuse, or a pupil makes a report to them, school reporting procedures should be followed.

### **Preventing Radicalisation**

Pupils are vulnerable to extremist ideology and radicalisation. Similar to protecting pupils from other forms of harms and abuse, protecting pupils from this risk should be a part of a schools or colleges 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.

Although there is no single way of identifying whether a pupil is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a pupil'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 pupils' behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral.

The teenage years are a time of great change and young people often want to be on their own, easily become angry and often mistrust authority. This makes it hard to differentiate between

normal teenage behaviour and attitude that indicates one of your students may have been exposed to radicalising influences.

The following behaviours listed here are intended as a guide to help you identify possible radicalisation:

### **Outward appearance**

- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with students who are different
- Becoming abusive to students who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Sympathetic to extremist ideologies and groups **Online behaviour**
- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

You know your students well, so are in a prime position to recognise if they're acting out of character. Trust and have confidence in your professional judgement and get advice if something feels wrong.

Pupils who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If a pupil is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

### **The Prevent Duty**

All schools and colleges are subject to a duty under section 26 of the Counterterrorism 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’ and colleges’ wider safeguarding obligations. Designated safeguarding leads (and deputies) 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 deputies) and other senior leaders in colleges 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. 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. “Terrorism” for these purposes has

the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act). The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

## **Serious violence**

Indicators which may signal that a pupil is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the pupil has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced pupil maltreatment
- Having been involved in offending, such as theft or robbery

Staff should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

## **Sexting**

This is following [guidance from the UK Council for Internet Safety](#)

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or pupils' social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or pupils's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or pupils' social care. The decision will be made and recorded in line with the procedures set out in this policy.

### **Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or pupils' social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to pupils' social care and/or the police immediately.

### **Informing parents/carers**

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through the local neighborhood.

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

### **Curriculum coverage**

The curriculum covering the sharing of nudes and semi-nudes, would be personalized to take into the individual pupils' level of understanding of what they have done/seen.

Pupils will learn about private parts of the body, who it is safe to share with, consent and asking permission for non-verbal pupils' staff are expected to tell them what they are going to do, including hygiene needs and respect a pupil's responses.

### **Sexual Violence and Sexual Harassment between Pupils in Schools**

Sexual violence and sexual harassment can occur:

- Between 2 pupils of any age and sex
- Through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Pupils 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.

If a victim reports an incident, it is essential that staff make sure they 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.

Some groups are potentially more at risk. Evidence shows that girls, pupils with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) pupils 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
- 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

If staff have any concerns about sexual violence or sexual harassment, or a pupil makes a report to them, school reporting procedures should be followed.