



## **Safeguarding/Child Protection Policy Appendices**

These appendices form part of the Safeguarding/Child Protection Policy but, for ease of reference, they have been put into this separate document.

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## ***Appendix A***

### **Abuse and other safeguarding issues**

#### ***Appendix A1***

#### **Understanding and identifying abuse and neglect (including definitions of abuse and neglect)**

##### ***Contents:***

- ***Physical Abuse***
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#### **Abuse**

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

#### **Physical Abuse**

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

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

Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse.

#### **Sexual Abuse**

Sexual Abuse is a sexual activity with a child. It involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. Sexual abuse can have a long-term impact on mental health.

Sexual abuse may involve physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing or touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming children in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. **Sexual abuse of children by other children (also known as peer on peer abuse) is a specific safeguarding issue in education and all staff should be aware of it and the Academy's procedures for dealing with it – see *Peer on Peer (child on child) abuse in Appendix A2*.**

## Emotional Abuse

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

It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development.

Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child.

Some level of emotional abuse is involved in all types of maltreatment of a child although it may occur alone.

## Neglect

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

Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from

physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child.

**It is important that practitioners remain alert and do not miss opportunities to take timely action. Neglect is not always straightforward to identify.**

## **APPENDIX A2**

### **Specific forms of abuse and other safeguarding issues**

#### **Contents:**

- *Child Sexual Exploitation (CSE)*
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- *So called 'Honour Based Abuse' (HBA) including Female Genital Mutilation and Forced Marriage*
- *Breast Flattening*
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- *Serious Violence*
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- *Sexual Violence and Sexual Harassment between Children*
- *Child sexual exploitation (CSE) and child criminal exploitation (CCE)*
- *Mental Health issues*
- *Self Harm and Suicidal Tendencies*
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#### ***Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)***

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

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

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

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

Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

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

### **Child Sexual Exploitation (CSE)**

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

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

CSE can range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

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

### ***Risk Identification***

**When any practitioner becomes aware that a child or young person is at risk of being sexually exploited, they should identify and react to the need to protect that individual from any future harm. This should always include notifying the DSL within the Academy.**

The DSL should ensure that the online assessment tool is completed (and if the case is subsequently referred into children's social care, the completed assessment should be included with the referral.) <http://www.northamptonshirescb.org.uk/about-northamptonshire-safeguarding-children-partnership/publications/cse-assessment/>

In all cases if there are concerns that the pupil is in immediate danger then the police should be contacted on 999 or the MASH.

In the event of an individual having concerns that a child or young person is at risk of being sexually exploited (but where there is no immediate danger), these should be reported to the DSL who should follow the procedures outlined in the Northamptonshire CSE Toolkit – Chapter 3 ([see NSCP website](#)).

Possible Indicators may include:

- appear with unexplained gifts, money or new possessions;
- children who have older boyfriends or girlfriends;
- associate with other children involved in exploitation;
- gang-association and/or isolation from peers/social networks;
- exclusion and/or regularly miss school or education or do not take part in education;
- leaving home/care without explanation and going missing for periods of time or regularly come home late;
- excessive receipt of texts/phone calls;
- misuse of drugs or alcohol;
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant;
- evidence of/suspicions of physical or sexual assault;
- relationships with controlling or significantly older individuals or groups;
- multiple callers (unknown adults or peers);
- frequenting areas known for sex work;
- concerning use of internet or other social media;
- increasing secretiveness around behaviours; and
- self-harm or changes in emotional well-being

**Indicators are a guide and do not replace, but should assist, the exercise of professional judgement. The person who is making the judgements needs to take into account the principles detailed above and be clear on the evidence that the risk is actually occurring or**



**whether further assessment is required to clarify this. The earlier the intervention the better chances of success.**

#### **Important points to remember – CSE:**

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex; some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (through others sharing videos or images of them on social media, for example);
- may be perpetrated by individuals or groups, males or females, and children or adults;
- the abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse;
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources;
- the coercers and perpetrators are usually an adult, but can be children and young people in a position of power of either gender;
- young people may exchange or sell sex as a result of constrained choices such as poverty, isolation and historic abuse;
- parents/carers may be involved in the sexual exploitation of their children, or fail to prevent/protect from it;
- groups of children and young people and multiple perpetrators may be involved (organised abuse);
- no child under 13 years can be assessed as low risk if behaviours indicate involvement in CSE;
- children and young people with additional needs require special consideration up to the age of 25 years.

#### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity:

- in exchange for something which 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 victim may have been criminally exploited even if the activity appears to be something they have agreed or consented to. CCE does not always involve physical contact; it can also occur through the use of technology.

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

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

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

Some of the following can be indicators of CCE. Children who:

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

### ***County lines***

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

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

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

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

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

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

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school/academy), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (*see below*) should be considered.

**If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services third sector providers who offer support to victims of county lines exploitation.**

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

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office: [County lines exploitation: guidance for practitioners updated February 2020](#).

NSCP Teabreak Guide to County Lines can be found at:

<http://www.northamptonshirescb.org.uk/about-northamptonshire-safeguarding-children-partnership/policies/tea-break-guides/>

### ***Modern slavery and the National referral Mechanism***

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

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

### ***Cybercrime***

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

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

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

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

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

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

### ***So-called 'Honour Based Abuse' (HBA) (including Female Genital Mutilation (FGM) and Forced Marriage***

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **Actions**

**If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or DDSL). As appropriate, the DSL (or DDSL) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.**

### **Female Genital Mutilation (FGM)**

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

### ***FGM mandatory reporting duty for teachers***

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. **Those failing to report such cases may face**

**disciplinary sanctions.** It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation: procedural information October 2015 \(updated January 2020\)](#).

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

FGM is usually carried out on girls between the ages of 5 and 14 years, but younger girls and adult women are sometimes victims of this procedure.

FGM is extremely traumatic. It can lead to serious, life-long physical and mental health problems. Internationally, FGM is recognised as a violation of the human rights of girls and women and when performed on a child, is a violation of the Rights of the Child. With growing and emerging migrant populations in Northamptonshire it is vital that agencies and organisations in Northamptonshire work together to ensure they put plans in place to raise awareness of its illegality and the risks, to prevent further procedures and support women who have experienced FGM.

***Identifying a child at risk of FGM*** – indications that FGM may be **about** to take place:

- the family comes from a community that is known to practice FGM (it may also be possible that they will practice FGM if a female family elder is around);
- parents requesting permission for their girls to be taken out of the Academy two weeks before or after the holidays (recovery period can be up to 8-10 weeks);
- a pupil talking about a long holiday to her country of origin or another country where the practice is prevalent;
- a pupil talking about “becoming a woman” or “rites of passage” or a “special ceremony”;
- a pupil talking about new clothing or special outfits;
- a pupil may confide in a professional that she is about to undergo a “special procedure” or attend a special occasion;
- becoming withdrawn or acting out of character;
- there are older girls or women in the family (e.g. older sister/s, mother) who have undergone FGM;
- any female child born to a woman who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family;

- any female child who has a sister who has already undergone FGM must be considered to be at risk, as must other female children in the extended family.

***Identifying a child who has been subject to FGM*** – indications that FGM may have **already** taken place:

- a pupil may spend long periods of time away from the classroom during the day with bladder or menstrual problems;
- frequently girls who have undergone FGM find it harder to urinate and it will therefore take longer to pass urine;
- there may be prolonged absences from the Academy;
- a prolonged absence from the Academy with noticeable behaviour changes on the girl's return could be an indication that the girl has recently undergone FGM;
- a pupil requiring to be excused from physical exercise lessons without the support of her GP;
- a pupil may confide in a professional or ask for help.

Professionals encountering a girl or woman who has undergone FGM should also be alert to the risk of FGM in relation to her:

- younger siblings;
- current daughters or daughters she may have in the future;
- extended family members.

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

Also: <http://www.northamptonshirescb.org.uk/schools/safeguarding-themes/fgm/>

## **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 (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Academies/schools can play an important role in safeguarding children from forced marriage.

Staff should be aware that forced marriage is not the same as arranged marriage (where both parties consent) and that forced marriage can happen to pupils as young as ten years of age.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 32-36 of which focus on the role of schools and colleges. Academy/school staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmf@fcdo.gov.uk](mailto:fmf@fcdo.gov.uk)

### ***Breast flattening***

Breast flattening, also known as breast ironing, is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (ranging from a few weeks to years) in order for the breasts to disappear or delay the development of the breasts entirely. In some families, large stones, a hammer or spatula that has been heated over hot coals can be used to compress the breast tissue. Other families may opt to use an elastic belt or binder to press the breasts to prevent them from growing. Breast flattening usually starts with the first signs of puberty, and is usually carried out by female relatives.

It should also be acknowledged that some adolescent girls and boys may choose to bind their breast using constrictive material due to gender transformation or questioning their identity, and this may also cause health problems.

In many cases, the abuser thinks they are doing something good for the girl by delaying the effects of puberty and the practice is designed to:

- prevent pregnancy and rape;
- make teenage girls look less “womanly” and no-longer sexually attractive to men;
- enable the girl to continue her education;
- prevent dishonour being brought upon the family if the girl begins sexual relations outside of marriage;
- prevent early marriage;
- deter unwanted attention.

There has not been extensive research done on breast flattening and the few studies that have been carried out indicate that the practice occurs predominantly in Cameroon. Other countries include: Togo, Chad, Kenya, Guinea Bissau, South Africa, Cote d'Ivoire, Benin and Zimbabwe.

Further information can be found in the DfE leaflet available from:  
[www.nationalfgmcentre.org.uk](http://www.nationalfgmcentre.org.uk)

### ***Preventing radicalisation and extremism***

***(See also the Trust “Preventing Radicalisation & Extremism” Policy)***

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance



of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

**As with other safeguarding risks, staff should be alert to changes in pupil's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or DDSL) making a Prevent referral. The DSL and DDSL should be aware of local procedures for making a Prevent referral.**

### **The Prevent duty**

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

The Prevent duty should be seen as part of the Academy's wider safeguarding obligations. DSLs, DDSLs and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools/academies (and also covers childcare).

The guidance is set out in terms of **four general themes: risk assessment, working in partnership, staff training, and IT policies** – *see below*.

The **local agenda** supports the Prevent Strategy. Communities and local authorities have a key part to play in developing a sense of belonging and will be an important part of wider partnership working. The threat is not just from radical religious groups such as 'Islamic State' but also from radical 'far right' and other political groups who may attempt to radicalise children and young people.

Northamptonshire County Council has embedded Prevent into its safeguarding procedures. Any contacts made with concerns in relation to Prevent should be assessed through the MASH. **If there are concerns that a child or young person may be vulnerable to violent extremism or radicalisation the DSL within the Academy should be informed and, after initial discussions, a multi-agency referral form should be submitted to the MASH.**

As part of the “**Prevent Duty**”, academies must address the four key areas, which are:

- **Risk Assessment;**
- **Working in Partnership;**
- **Staff Training;**
- **IT Policies.**

### **Risk Assessment**

Academy staff should know how to make a referral where they have concerns about potential radicalisation.

Advice and guidance can be sought from the Prevent Engagement Officers at Northamptonshire Police:

E-mail: [prevent@northants.pnn.police.uk](mailto:prevent@northants.pnn.police.uk) or phone **101 (ext. 343931) or 101 (ext. 345215)**

Or from the DfE who also have a dedicated helpline: **020 7340 7264.**

Actual Referrals must go to the MASH.

### **Working in Partnership**

Academies are required to work in partnership with the NSCP, the Home Office trained Prevent Engagement Officers and other partner agencies to safeguard and promote the welfare of children. Prevent Engagement Officers and other partners should be accessed as relevant to provide advice and support with regard to this duty.

Effective engagement with parents/carers and their families is also important as they are in a key position to spot signs of radicalisation. The Academy recognises it is important to assist and advise families who raise concerns and direct them to support mechanisms.

### **Staff Training**

In line with the Prevent Duty, the Academy is required to assess training needs in the light of their assessment of risk. For details of individual Academy risk assessments – *see the section on [Academy Specific Details](#) at the end of the Safeguarding/Child Protection Policy (the Policy).*

The DSL will access Prevent training in line with the requirements of **KCSIE** and disseminate appropriate information to other Academy staff. In addition, all staff will complete Channel online training and certificates will be retained in Personnel Files.

## **IT Policies**

Measures are in place at the Academy, which include filtering and monitoring of online access. Learning experiences are in place, evaluated and regularly reviewed, which help the pupils to understand ways in which to stay safe online. Further details of measures taken can be found in the section on *Academy Specific Details in the Policy*.

Suspected on-line terrorist content can be reported to HM Government:  
[www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)

## **Further Information and additional support:**

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

The Home Office has developed three e-learning modules:

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

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

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

- [PREVENT](#) (see GOV.UK website)
- Community Safety Team, Northamptonshire County Council  
<https://www3.northamptonshire.gov.uk/councilservices/fire-safety-and-emergencies/community-safety/Pages/default.aspx>
- Prevent Officers:  
DS Andy Blaize  
DC Shane O'Brien  
DC Jody Williams  
[Prevent@northants.pnn.police.uk](mailto:Prevent@northants.pnn.police.uk)

## **Channel**

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

## **Serious Violence**

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

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

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

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

Advice for schools/academies is provided in the Home Office's ["Preventing youth violence and gang involvement: Practical advice for schools and colleges"](#) ["Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance"](#).

## **Domestic Abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours,

including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

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

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

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

## **Operation Encompass**

[Operation Encompass](#) operates in all police forces across England. It helps police and schools/academies work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school/academy before the child or children arrive at school/academy the following day. This ensures that the school/academy has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children’s social care if they are concerned about a child’s welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

**Domestic Abuse Notifications to Schools/Academies** – this scheme involves early reporting when a child or young person has been involved in a domestic incident. Upon a police referral, the Education Inclusion Partnership Team within Northamptonshire County Council will contact the DSL at the Academy and share information about the pupil who has witnessed or been subject to domestic abuse. The DSL should share this information with

relevant staff and assess what type of support (silent or overt) needs to be offered to the affected pupil.

### **Domestic Abuse indicators in children**

The majority of referrals to the MASH and a large number of Child Safeguarding Practice Reviews (SPRs) (previously known as Serious Case Reviews) involve domestic abuse.

**Academies should therefore ensure that they look out for possible indicators and talk to the DSL as a matter of urgency.**

It is important to note that children may respond to domestic abuse in different ways even within the same family. Some children may be profoundly affected by witnessing domestic abuse whilst others appear to be relatively unaffected. It is therefore important to remember that the behaviour below may be due to other causes.

Children's coping strategies and reactions to domestic abuse may also be similar to those for other forms of abuse. Learning to recognise domestic abuse can therefore be useful in helping to protect children from all forms of abuse.

Possible Indicators:

#### **0 – 5 years**

- violence to the mother during pregnancy may result in neurological and physical damage;
- physical and emotional neglect may result in basic needs for food and warmth not being met;
- under-stimulation and neglect can result in cognitive delay;
- witnessing unpredictable and frightening behaviour may result in symptoms similar to post traumatic stress disorder;
- parental unhappiness, tension, irritability or lack of commitment may lead to false attachments;
- babies and toddlers have difficulty in communicating distress.

#### **5-9 years**

- the risk of physical injury may lead to symptoms of extreme anxiety and fear. The pupil may be subject to abuse;
- academy behaviour and academic attainment may be impaired;
- pupils may blame themselves for parental behaviour. Self-blame may result in low self-esteem;
- unplanned separations may cause distress and disrupt education and friendship patterns;
- embarrassment and fear of unpredictable parental behaviour may result in curtailed friendships;
- pupils may take on too much responsibility for self, parents and younger children.

## **10 years +**

- coping with puberty without support;
- denying own needs and feelings;
- low self-esteem;
- increased risk of psychological problems, behavioural disorders, suicidal behaviours and offending;
- poor Academy attainment due to difficulties concentrating;
- poor Academy attainment due to absence in order to protect parent or younger children;
- unacceptable behaviour resulting in pattern of Academy exclusion;
- isolation caused by reluctance to disclose for fear of family disruption.

## **National Domestic Abuse Helpline**

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

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

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)
- [Domestic abuse: specialist sources of support](#) – GOV.UK ([www.gov.uk](http://www.gov.uk)) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)
- Refuge – <http://www.refuge.org.uk/get-help-now/support-for-women/what-about-my-children/>

## ***Peer-on-Peer/Child on Child Abuse***

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside of school/academy and online.

**All staff should be aware of the above and it is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports.**

**All staff should understand, that even if there are no reports in their Academy it does not mean it is not happening, it may be the case that it is just not being reported. As such it is**

**important if staff have any concerns regarding peer-on-peer abuse they should speak to their DSL (or DDSL).**

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should know that such incidents must be referred to the DSL (or DDSL) for appropriate support and intervention to be put into place. This is especially important where the alleged behaviour:

- is serious and potentially a criminal offence;
- could put pupils in the Academy at risk;
- is violent;
- involves pupils being forced to use drugs or alcohol;



- involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting).

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

- whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- whether the perpetrator has repeatedly tried to harm one or more other children; or
- whether there are concerns about the intention of the alleged perpetrator.

**Procedures are in place to minimise the risk of peer-on-peer abuse and to record, investigate and deal with allegations of peer-on-peer abuse. Peer-on-peer abuse will not be tolerated and individuals (victims, perpetrators etc.) will be supported.**

The Academy tries to minimise incidents of peer-on-peer abuse by:

- providing a developmentally appropriate PSHE and RSHE curriculum which develops pupils to understand acceptable behaviour and keeping themselves safe;
- having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued;
- developing robust risk assessments where appropriate;
- having relevant policies in place (e.g. Behaviour Policy).

Further details of what the Academy does can be found in the section on [Academy Specific Details in the Policy](#).

Staff are alert to the possibility that a pupil who has harmed another may well also be a victim. However, the interests of the identified victim must always be the paramount consideration and staff are alert to the fact that there is likely to be a risk to pupils other than the current victim.

Evidence suggests that children who abuse others may have suffered considerable disruption in their lives, been exposed to violence within the family, may have witnessed or been subject to physical or sexual abuse, have problems in their educational development and may have committed other offences. Such children are likely to be children in need and some will, in addition, be suffering, or at risk of suffering, significant harm and may themselves be in need of protection.

Children who abuse others should be held responsible for their abusive behaviour, while being identified and responded to in a way that meets their needs as well as protecting others.

Staff should not dismiss some abusive behaviour as 'normal' between young people and should not develop high thresholds before taking action.

**KCSIE** makes it clear that “abuse is abuse and should never be tolerated or passed off as “banter” “just having a laugh” or part of “growing up” or “boys being boys.

Staff are also aware of possible cases of sexual violence or sexual harassment between children and more detail about this is set out below.

### ***Sexual Violence and Sexual Harassment between Children (Child on Child Sexual Violence and Sexual Harassment) in Schools/Academies***

Sexual violence and sexual harassment can occur:

- between two children of **any age and sex**;
- online; and
- through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap and they are **never acceptable**.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Academies not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools/academies with the foundation for a calm, considered and appropriate response to any reports.

Children who are victims of sexual violence and sexual harassment wherever it happens, 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/academy. Academies should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Academy, including intimate personal relationships (*see also sections on child sexual exploitation and child criminal exploitation above*).

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

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Staff should also be aware that some groups are potentially more at risk. Evidence shows that in addition to girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

Dismissing or tolerating such behaviours risks normalising them.

## **What is sexual violence and sexual harassment?**

### ***Sexual Violence***

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

#### **Rape:**

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

#### **Assault by Penetration:**

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

#### **Sexual Assault:**

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

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

### **What is consent?**

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

Further information about consent can be found in: [Rape Crisis England & Wales – Sexual consent](#)

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

### ***Sexual Harassment***

When referring to sexual harassment here it means ‘unwanted conduct of a sexual nature’ that can occur online and offline. Reference to sexual harassment is in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

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

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

## **Responding to reports of sexual violence or sexual harassment**

**Part 5 of KCSIE** provides effective safeguarding practice and principles for schools/academies to consider in their decision making process. It states, however, that *“ultimately, any decisions are for the school or college to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police as required.”*

### ***The immediate response to a report***

#### **Responding to the report**

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of Academy staff may overhear a conversation that suggests a child has been harmed or a child’s own behaviour might indicate that something is wrong. As stated before, if staff have **any** concerns about a child’s welfare, they should act on them immediately rather than wait to be told.

The Academy’s initial response to a report from a child is incredibly important. How the Academy responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the Academy should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

All staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the DSL or DDSL). However, this might not always be possible;
- where the report includes an online element, being aware of [searching screening and confiscation advice](#) (for schools) and [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). **The key consideration is for staff not to view or forward illegal images of a child.** The

highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;

- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust: this could be anyone on the Academy staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools/academies should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the DSL (or DDSL), as soon as practically possible, if the DSL (or DDSL) is not involved in the initial report.

## **Risk assessment**

When there has been a report of sexual violence, the DSL (or DDSL) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;

- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the Academy, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded on MyConcern and should be kept under review. At all times, the Academy should be actively considering the risks posed to all their pupils and put adequate measures in place to protect them and keep them safe.

The DSL (or DDSL) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above Academy risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the Academy's approach to supporting and protecting their pupils and updating their own risk assessment.

## **Action following a report of sexual violence and/or sexual harassment**

### ***What to consider***

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of '**it could happen here**'. Academies should be aware of, and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the Academy.

The DSL (or DDSL) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the Academy's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the Academy's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour (HSB) has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;

- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children, adult students or Academy staff; and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, academies should follow general safeguarding principles as set out in **KCSIE** and in this policy.

Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

The starting point regarding any report should always be, as previously stated, that there is a **zero tolerance approach** to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.



## Children sharing a classroom: Initial considerations when the report is made

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

However, reports of **rape and assault by penetration** are likely to be especially difficult with regard to the victim, and close proximity with the alleged perpetrator(s) is likely to be especially distressing. Whilst the Academy establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) **should** be removed from any classes they share with the victim. The Academy should also **carefully** consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on Academy premises (including during any before or after school-based activities) and on transport to and from the Academy, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

For **other reports** of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing Academy premises and Academy transport, should be considered immediately.

In all cases, the initial report should be carefully evaluated, reflecting the considerations set out in the *paragraph on 'Action following a report of sexual violence and/or sexual harassment' above*. The wishes of the victim, the nature of the allegations and the protection of all children in the Academy will be especially important when considering any immediate actions.

## Options to manage the report

It is important that academies consider every report on a case-by-case basis as stated above. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered.

Where a report is going to be made to children's social care and/or the police, then, as a general rule, the Academy should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the Academy taking immediate action to safeguard their children, where required.

There are four likely scenarios for academies to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour.

Where a pattern is identified, the Academy should decide on a course of action. Consideration should be given to whether there are wider cultural issues within the Academy that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

The four scenarios are:

### **1. *Manage internally***

- In some cases of **sexual harassment**, for example, one-off incidents, the Academy may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.
- Whatever the response, it should be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded on MyConcern.

### **2. *Early help***

- In line with 1 above, the Academy may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the DSL (and DDSL) know what the early help process is and how and where to access support.
- More information on early help is set out in the section on *Thresholds for Intervention on page 24 of the Policy* with full details of the early help process in Chapter one of [Working Together to Safeguard Children](#).
- Multi-agency early help will work best when placed alongside strong Academy policies, preventative education and engagement with parents and carers.
- Early help and the option to manage a report internally do not need to be mutually exclusive: an Academy could manage internally and seek early help for both the victim and perpetrator(s).
- Whatever the response, it should be under-pinned by the principle that there is zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded on MyConcern.

### **3. Referrals to children's social care**

- Where a child has been harmed, is at risk of harm, or is in immediate danger, academies should make a referral to local children's social care.
- At the point of referral to children's social care, academies will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the Academy (especially the DSL or DDSL) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- Academies should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the Academy. It will be important for the DSL (or DDSL) to work closely with children's social care (and other agencies as required) to ensure any actions the Academy takes do not jeopardise a statutory investigation. The risk assessment as above will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the Academy should be immediate.
- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The Academy (generally led by the DSL or DDSL) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL (or DDSL) should consider other support mechanisms such as early help, specialist support and pastoral support.
- Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded on MyConcern.

### **4. Reporting to the Police**

- Any report to the police will generally be in parallel with a referral to children's social care (as above).
- It is important that the DSL (and DDSL) are clear about the local process for referrals and follow that process – *see section on Referrals for statutory services on page 25 of the Policy*.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a

criminal justice, approach. The following advice may help academies decide when to engage the Police and what to expect of them when they do: [When to call the police](#).

- Where a report has been made to the police, the Academy should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- At this stage, the Academy will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the Academy is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.
- All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the DSL (and DDSL) are aware of their local arrangements.
- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the Academy continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the DSL (or DDSL) to work closely with the police (and other agencies as required), to ensure any actions the Academy take do not jeopardise the police investigation.
- If academies have questions about the investigation, they should ask the police. The police will help and support the Academy as much as they can (within the constraints of any legal restrictions).
- Whatever the response, it should be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions should be recorded on MyConcern.

### **Considering bail conditions**

- The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.
- Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.
- Whatever arrangements are in place, the Academy will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within the Academy.
- Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the Academy; the potential for the suspected person to

intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc.).

- Careful liaison with the police investigators should help to develop a balanced set of arrangements.

### **Managing any delays in the criminal process**

There may be delays in any case that is being progressed through the criminal justice system. Academies **should not wait** for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the Academy. The risk assessment as referred to above will help inform any decision.

### **The end of the criminal process**

- If a child is convicted or receives a caution for a sexual offence, the Academy should update its risk assessment, ensure relevant protections are in place for all the children at the Academy and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains in the same Academy as the victim, the Academy should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the Academy thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.
- Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils in the Academy. It will be important that the Academy ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).
- Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the Academy should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Academies should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

### **Unsubstantiated, unfounded, false or malicious reports**

As previously stated, all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded on MyConcern.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the Academy should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

### ***Ongoing response***

#### **Safeguarding and supporting the victim**

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the Academy is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Academies should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- Support can include:
  - Early help and children's social care as set out previously.

- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with academies to ensure the best possible outcomes for the victim.
- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or Academy. Contact details for ChISVAs can be found at [Rape Crisis](#) and [The Survivors Trust](#).
- Child and adolescent mental health services ([CAMHS](#)) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CAHMS have their own website, which will have information about access, referrals and contact numbers.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact [Rape Crisis](#) (England & Wales) or The Survivors Trust for details of local specialist organisations. The [Male Survivors Partnership](#) can provide details of services which specialise in supporting men and boys.
- NHS – [Help after rape and sexual assault](#) – NHS ([www.nhs.uk](http://www.nhs.uk)) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: [Find Rape and sexual assault referral centres](#). Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- [Childline](#) provides free and confidential advice for children and young people.
- [Internet Watch Foundation](#) works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- [Childline / IWF: Remove a nude image shared online](#) *Report Remove* is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the Academy should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or DSL) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible). Academies should respect and support this choice.

A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. While the Academy should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the Academy should provide a physical space for victims to withdraw.

It may be necessary for the Academy to maintain arrangements to protect and support the victim for a long time. The Academy should be prepared for this and should work with children's social care and other agencies as required.

It is therefore important that the DSL knows how and where to seek support.

It is important that the Academy do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.

Whilst they should be given all the necessary support to remain in the Academy, if the trauma results in the victim being unable to do this, alternative provision or a move to another school/academy should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The DSL should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file. Information sharing advice referenced at *paragraphs 4.8 and 4.10 of the Policy* will help support this process.



### **Ongoing Considerations: Victim and alleged perpetrator(s) sharing classes**

The section above considered the immediate response to a report. Once the DSL (or DDSL) has decided what the next steps will be in terms of progressing the report, they should carefully consider again the question of the victim and alleged perpetrator(s) sharing classes and sharing space at the Academy. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them.

It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. As always when concerned about the welfare of a child, the best interests of the child should come first. In all cases, the Academy should follow general safeguarding principles as per the guidance in *KCSIE* and this policy.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim. The Academy should also consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on Academy premises (including during before and after school-based activities) and on transport to and from the Academy where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). As stated previously, close liaison with the police is essential.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the Academy should take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same Academy would seriously harm the education or welfare of the victim (and potentially other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the Academy should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator(s) is going to remain at the Academy, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on Academy premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

In all cases, the Academy should record on MyConcern and be able to justify their decision making.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis.

In all cases, the Academy should record on MyConcern and be able to justify their decision-making.

## **Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour**

Advice about safeguarding and supporting the alleged perpetrators is also set out in the DfE advice: [Sexual violence and sexual harassment between children at schools and colleges](#).

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- The Academy will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. More information on HSB can be found at paras 18-22 of the detailed advice, [Sexual violence and sexual harassment between children at schools and colleges](#). Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police. The NSPCC also provides free and independent advice about HSB: [NSPCC Learning – Protecting children from harmful sexual behaviour](#) and [NSPCC – Harmful sexual behaviour framework](#)
- The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- [Contextual Safeguarding Network – Beyond Referrals \(Schools\)](#) provides a school self-assessment toolkit and guidance for addressing HSB in schools.
- StopItNow – [Preventing harmful sexual behaviour in children – Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.
- It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- Advice on [behaviour and discipline in schools](#) is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful,

reasonable and fair. Further information about exclusions can be found in statutory guidance for schools [Exclusions from maintained schools, academies and PRUs](#).

- The Academy can be a significant protective factor for children who have displayed HSB, and continued access to the Academy, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL should take responsibility to ensure this happens as well as transferring the child protection file. Information sharing advice referenced at *paragraphs 4.8 and 4.10 of the Policy* will help support this process.

### **Toolkits**

- [Childnet – STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- [Childnet – Just a joke?](#) Provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.

### ***Upskirting***

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm’. It is a criminal offence. Anyone of any sex can be a victim.

### ***Dog Bites on Children***

The following guidance has been agreed by partner agencies for the NSCP.

#### **Academy staff must:**

- be aware of an injury to a child caused by a dog;
- be aware of the treating of an injury to a child caused by a dog;
- establish precisely when and how the injuries were caused;
- establish if there is any history of previous, similar injuries and when this occurred.

Consideration should be given to whether the injuries caused are “non-accidental injuries”.

**A referral to the MASH should be considered if any of the following criteria apply:**

- the pupil injured is under 2 years of age;
- the pupil is under 5 years of age and injuries have required medical treatment;
- the pupil is over 5 years and under 18 who has been bitten more than once by the same dog;
- the pupil is under 18 years of age, injuries have required medical treatment and initial information suggests the dog responsible could be prohibited and/or dangerous;
- a prohibited and/or dangerous dog is reported and/or treated, and is believed to be living with and/or frequently associated with children under 5 years of age.

Some calls might be logged 'for information' only by the agencies, if it is clearly established that no significant or continued risk is likely to the pupil, or other children (for example, if the dog has already been 'put down' or removed).

**All should be mindful that the bite does not have to be a vicious injury.  
Contact the MASH immediately for advice if unsure. Call 0300126 1000.**

#### **Definitions:**

- certain dogs are '**prohibited**' and if any agency has any knowledge or report of a dog of this type, the matter should be reported to the police immediately;
- any dog can be '**dangerous**' (as defined by The Act) if it has already been known to inflict or threaten injury.

**For further information, see the NSCP guidelines at:**

[Safeguarding Children from Dangerous Dogs – Practice Guidance – Northamptonshire Safeguarding Children Board \(northamptonshirescb.org.uk\)](https://www.northamptonshirescb.org.uk/Safeguarding-Children-from-Dangerous-Dogs-Practice-Guidance)

#### ***Mental Health Issues***

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

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

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

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

### **Children requiring mental health support**

Schools/academies have an important role to play in supporting the mental health and wellbeing of their pupils.

The Academy has clear systems and processes in place for identifying possible mental health issues, including routes to escalate and clear referral and accountability systems – *see the section on [Academy Specific Details in the Policy](#).*

Schools/academies can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in [the mental health and behaviour in schools guidance](#), the Academy may also wish to follow this guidance as best practice.

See [Rise Above](#) for links to all materials and lesson plans.

Children who are mentally healthy have the ability to:

- develop psychologically, emotionally, intellectually and spiritually;
- initiate, develop and sustain mutually satisfying personal relationships;
- use and enjoy solitude;
- become aware of others and empathise with them;
- play and learn;
- develop a sense of right and wrong;
- resolve (face) problems and setbacks and learn from them.

Staff seeing pupils regularly are well placed to spot any changes in behaviour that might indicate an issue. The balance between the risk and protective factors set out above is most likely to be disrupted when difficult events happen in pupils' lives. This includes loss or separation (e.g. death, parental separation, divorce, hospitalisation etc.). It also includes other life changes (e.g. transition to a new school, birth of a sibling, bullying, domestic abuse etc.).

Some children experience a range of emotional and behavioural problems that are outside the normal range for their age or gender. These children could be described as experiencing mental health issues/problems or disorders.

Mental health professionals have defined these as:

- Emotional disorders such as phobias, anxiety states and depression;
- Conduct disorders such as stealing, defiance, fire-setting, aggression and anti-social behaviour;
- Hyperkinetic disorders such as disturbance of activity and attention;

- Developmental disorders such as delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders;
- Attachment disorders such as children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers;
- Other mental health problems including eating disorders, habit disorder, post-traumatic stress syndromes, somatic and psychotic disorders (such as schizophrenia and manic depressive behaviour).

### ***Self Harm and Suicidal Tendencies***

Self-harm, self-mutilation, eating disorders, suicide threats and gestures by a child must always be taken seriously, as they could be indicative of a serious mental or emotional disturbance.

### ***Substance Abuse***

There are many reasons why adults take drugs or drink alcohol. If doing so has negative consequences, then it may be regarded as misuse. Some people take greater risks than others do, but anyone can have a problem with drugs or alcohol.

To be healthy and develop normally, children must have their basic needs met. If a parent/carer is more concerned with feeding an addiction, or is under the influence of drugs or alcohol, it may reduce their ability to meet their children's needs.

A disorganised lifestyle is a frequent consequence of substance misuse. Parents/carers may fail to shop, cook, wash, clean, attend appointments or pay bills. This can lead to an inadequate home environment for children.

Children need conversation and play to stimulate their mental development, but substance misuse may affect a parent's/carer's ability to engage with their child. It may also affect a parent's/carer's ability to control their emotions. Severe mood swings and angry outbursts may confuse and frighten a child, hindering healthy development and control of their own emotions. Such parents/carers may even become dependent on their own child for support. This can put stress on a child and may mean they miss out on the experiences of a normal childhood.

Other consequences of substance misuse may include: lost jobs, unsafe homes, broken marriages, severed family ties and friendships. The disruption caused by efforts by the local authority to help is also likely to negatively affect a child.

There are several signs that may indicate that someone has a problem. Adults who misuse drugs or alcohol may:

- become consumed or violent;
- drink alone;
- drink every day;
- get “the shakes” when they have not had a drink;
- miss work or social activities;
- neglect their own health, appearance and homes;
- not be able to stop their drug or drinking habit;
- try to hide or deny their problem.

The signs that may indicate that a child is being neglected due to parent’s/carer’s drug or alcohol misuse include:

- poor appearance;
- delayed development;
- a child who is caring for a parent.

### ***Child Abduction and Community Safety Incidents***

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

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

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

It is important that lessons focus on building children’s confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org) .

### ***Children and the Court System***

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children – see below. They explain each step of the process, support and special measures that are available.

There are diagrams illustrating the courtroom structure and the use of video links is explained.

5-11 year olds – <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>

12-17 year olds – <https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

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

### ***Children with Family Members in Prison***

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health.

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

<https://www.nicco.org.uk/>

### ***Homelessness***

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any DDSL(s)) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into the MASH where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. There are factsheets, which usefully summarise the new duties: "Homeless Reduction Act Factsheets" can be found at:

<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.



In most cases, Academy staff will be considering homelessness in the context of pupils who live with their families and intervention should be on that basis.

## **Additional advice and support**

### **Abuse**

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

### **Bullying**

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

### **Children missing from education, home or care**

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

### **Children with family members in prison**

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

### **Child Exploitation**

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

### **Drugs**

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

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

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

### **Health and Well-being**

- [Fabricated or induced illness: safeguarding children](#) – DfE, DH, HO

- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) – Public Health England
- [Medical-conditions: supporting pupils at school](#) – DfE statutory guidance
- [Mental health and behaviour](#) – DfE advice

### **Homelessness**

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

### **Private fostering**

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

### **Radicalisation**

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

### **Violence**

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

## **APPENDIX B**

### **Roles and Responsibilities**

#### ***Appendix B1***

#### **Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)**

##### ***Designated Safeguarding Lead***

The Headteacher must appoint an appropriate **senior member** of staff from the Academy **leadership team** to the role of Designated Safeguarding Lead (DSL) and (an) appropriate senior member(s) of staff to deputise for the DSL (DDSL(s)) in their absence. The DSL should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

The responsibilities of the DSL are found in full in ***Annex C of KCSIE*** and are also set out here:

#### **1. Manage referrals**

The DSL is expected to refer cases:

- of suspected abuse and neglect to the MASH as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. [NPCC – When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.

#### **2. Working with others**

The DSL is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners (*for information re: safeguarding partners – see part of Paragraph 3.1 on page 10 of the Policy*);

- provide information to the NSCP/local authority on safeguarding and child protection, including co-operating with other agencies and supporting with MASH enquiries (including during evenings/holidays where required);
- liaise with the AGC and the local authority on any deficiencies brought to the attention of the AGC and how these should be rectified without delay;
- liaise with the headteacher to inform him or her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the “case manager” (as per **Part four of KCSIE**) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member (including supply staff and contractors);
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and SENCOs) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children’s needs are considered holistically;
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at the Academy. This includes:
  - ensuring that the Academy knows who its cohort of pupils who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - supporting teaching staff to provide additional academic support or reasonable adjustments to help pupils who have or have had a social worker reach their potential recognising that even when statutory social care intervention has ended, there is still a lasting impact on pupil’s educational outcomes.

### **3. Information sharing and managing the child protection file**

The DSL is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely on MyConcern.

Records should include:

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

*See paragraph 4.9 of the Policy.*

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in *paragraph 4.8 of the Policy*.

Where children leave the Academy (including in year transfers) the DSL should ensure their child protection file is transferred to the new school/academy as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools/academies should ensure key staff such as designated safeguarding leads and SENCOs are aware as required.

Lack of information about their circumstances can impact on the pupil's safety, welfare and educational outcomes. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school/academy in advance of a pupil leaving to help them put in place the right support to safeguard this pupil and to help the pupil thrive in the school/academy. For example, information that would allow the new school/academy to continue supporting pupils who have had a social worker and been victims of abuse and have that support in place for when the pupil arrives.

### **4. Raising Awareness**

The DSL should:

- ensure each member of staff has access to, and understands, the Academy's Safeguarding/child protection policy and procedures, especially new and part-time staff;
- ensure that, following review of the Trust's safeguarding/child protection policy, procedures are updated and reviewed regularly (and in particular ensure that the section on *Academy Specific Details* in the Policy is updated) and that the policy is implemented;

- ensure the safeguarding/child protection policy is available publicly and parents/carers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the Academy in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and the Academy leadership staff; and
- ensure each member of staff understands how MyConcern operates.

## **5. Training, knowledge and skills**

The DSL (and any DDSL(s)) should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated at least every two years. The DSL and DDSL (s) should also undertake Prevent awareness training.

Training should provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;

- understand the importance of information sharing, both within the Academy, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the Academy with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the Academy;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Academy may put in place to protect them.

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

## **6. Providing support to staff**

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

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

## **7. Understanding the views of children**

It is important that children feel heard and understood. Therefore, DSLs should be supported in developing knowledge and skills to:

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

## 8. Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in this policy, and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the Academy, and with other schools/academies on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR);
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping;
- understand how MyConcern operates and be able to operate it effectively in line with Trust guidance;
- ensure all staff have induction training covering safeguarding and child protection and are able to recognise and report any concerns immediately they arise; and
- ensure all staff are given, read, and sign to acknowledge having read and understood:
  - Safeguarding/Child Protection Policy;
  - **KCSIE – Part one**;
  - the Staff Code of Conduct;
  - Acceptable Use Policy (AUP) (and Clarification and Guidance in relation to the AUP);
  - Bring Your Own Device (BYOD) Policy;
  - Behaviour Policy;
  - Remote Education: Online safety (Safeguarding and GDPR considerations) – guidance for schools/academies
  - “Prevent Duty 2015, updated 2021”;
  - British Values and Preventing Radicalisation & Extremism Policy; and



- Whistleblowing Policy;

### **Availability**

During term time the DSL (or a DDSL) should always be available (during Academy hours) for staff in the Academy to discuss any safeguarding concerns. Whilst generally speaking the DSL (or DDSL) would be expected to be available in person, it is a matter for the Academy, working with the DSL, to define what “available” means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for the Academy and the DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### ***Deputy Designated Safeguarding Leads***

Deputies should be trained to the same standard as the DSL and the role should be explicit in their job description. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL, **this lead responsibility is not to be delegated.**

## **Appendix B2**

### **Academy Governance Committees (AGC)**

In accordance with the Statutory guidance “***Keeping children safe in education***” – **September 2021 (KCSIE)**, the Academy Governance Committee (AGC) will ensure that:

- all members of the AGC have:
  - Enhanced Disclosure & Barring Service (DBS) checks;
  - Section 128 Checks;
  - appropriate Safeguarding/Child Protection awareness and training; and
  - read ***Part one of KCSIE***.
- the Academy has safeguarding/child protection procedures and training in place, which are, effective and comply with the law at all times and in line with this policy, in order for appropriate action to be taken in a timely manner to safeguard and promote children’s welfare;
- this policy is made available publicly via the Academy website and safeguarding information can be found in the entrance/reception of the Academy;
- opportunities are provided for staff to contribute to and shape safeguarding arrangements and how this Policy is implemented in the Academy through staff meetings and other training sessions;
- relevant policies and procedures are implemented, including the Trust’s Staff Code of Conduct which includes information regarding acceptable use of technologies, staff/pupil relationships and communications including the use of social media;
- the Academy operates safer recruitment practices, including appropriate use of references and all required checks on new staff and volunteers in line with the requirements of ***Part three of KCSIE***. The Headteacher, any governor and other staff, as appropriate, involved in the recruitment process have undertaken Safer Recruitment training, which as a minimum covers the content of ***Part three of KCSIE***, and keep it regularly updated (the Trust requirement is at least every 5 years);
- there are procedures in place (in line with this policy) to manage safeguarding concerns, or allegations against staff (including supply staff, volunteers and contractors);
- there is an appropriate senior member of the Academy’s **leadership team**, who has the appropriate status and authority within the Academy to carry out the duties of the post, who is designated to take **lead responsibility** for safeguarding and child protection (including online safety) (the DSL) and that there is always cover for this

role (the Deputy DSL(s)). This responsibility is explicit in the role holder's job description;

- the DSL (and Deputy DSL(s)) undertake local training (in addition to basic safeguarding/child protection training) and this is refreshed every two years, as required by law. Additionally, that the DSL (and Deputy DSL(s)) receive regular updates which take a variety of forms such as meetings, online training etc;
- there is an individual member of the AGC who will champion issues to do with safeguarding children and child protection within the Academy, monitor practices and procedures, liaise with the DSL, and provide information and reports to the AGC. Their details are found in the section on [Academy Specific Details](#) in the Policy;
- all staff and volunteers undergo safeguarding and child protection training (including online safety) at induction, the training is regularly updated and induction and training is in line with any advice from the safeguarding partners (*see part of paragraph 3.1 of the Policy – page 10 for information regarding safeguarding partners*). In addition, all staff receive regular safeguarding and child protection updates, including online safety (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. For specific details in relation to the Academy – *see the section on [Academy Specific Details](#) in the Policy*;
- new staff and volunteers are made aware of the Academy's arrangements for safeguarding and child protection and of their responsibilities. They will also ensure that, as part of induction procedures, the documents listed in the paragraph on 'Induction' under '*What academy staff need to know*' in the Policy are used and/or explained and copies provided;
- that those staff who work directly with children read **at least Part one of KCSIE** and, working with the senior leadership team and especially the DSL, that those staff who do not work directly with children read **Part one**;
- a proportionate risk-based approach is taken to the level of information that is provided to temporary staff and volunteers
- safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole Academy safeguarding approach and wider staff training and curriculum planning. Whilst considering training requirements, AGCs should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and require teachers to have a clear understanding of the needs of all pupils.
- pupils are taught about safeguarding, including online safety, through teaching and learning opportunities and a broad, balanced curriculum – for details – *see the section on [Academy Specific Details](#) in the Policy* and the AGC recognise that a one

size fits all approach may not be appropriate for all pupils, and a more personalised or contextualised approach for more vulnerable pupils, victims of abuse and some SEND pupils might be needed;

- the AGC and the senior leadership team, especially the DSL and DDSL(s), are aware of and follow their local arrangements, including the local criteria for action and the local protocol for assessment. They also ensure they are reflected in their own policies and are prepared to supply information as requested by the safeguarding partners.
- the Academy contributes to multi-agency working in line with statutory guidance ["Working Together To Safeguard Children 2018"](#);
- arrangements are in place that set out clearly the processes and principles for sharing information within the Academy and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required;
- relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR;
- information is provided to the local authority (on behalf of the [NSCP](#)) through the Section 175 Safeguarding Audit and other information, as requested;
- systems are in place, well promoted, easily understood and easily accessible for pupils to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback;
- pupil's wishes and/or feelings are taken into account when determining what action to take and services to provide (voice of the child). The Academy follows the "Signs of Safety" approach required by NSCP. *See Paragraph 3.1 of the Policy for more details on pupil voice;*
- whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, the Academy is doing all that they reasonably can to limit pupil's exposure to the risks from the Academy's IT system. As part of this process, they should ensure the Academy has appropriate filtering and monitoring systems in place to monitor staff and pupil internet usage – see *paragraph 3.2.2 of the Policy* and for specific details – see the section on [Academy Specific Details](#) in the Policy;
- the Academy has clear systems and processes in place for identifying possible mental health issues, including routes to escalate and clear referral and accountability systems;

- the Academy has appropriate safeguarding arrangements in place to respond to pupils who go missing from education particularly on repeat occasions– *see section on ‘Children Missing from Education’ in paragraph 5.1.2 of the Policy;*
- a designated teacher is appointed who will work with the local authorities to promote the educational achievement of children who are looked after and those who were previously looked after and they will ensure this person has appropriate training and the relevant qualifications and experience. For details of the current teacher – *see the section on [Academy Specific Details](#) in the Policy*
- staff have the skills, knowledge and understanding to keep looked after children safe;
- any deficiencies or weaknesses concerning safeguarding or child protection are brought to the attention of the AGC and will be rectified without delay;
- the Chair of Governors (or, in the absence of a Chair, the Vice Chair) deals with any allegations of abuse made against the Headteacher, in liaison with one of the local authority Designated Officers (LADO) and in accordance with the provisions of **Part four of KCSIE** and the Trust’s ‘Policy for dealing with Allegations made against/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors’;
- there are clear procedures for dealing with allegations of peer-on-peer abuse;
- processes are in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

## **Appendix B3**

### **Headteacher**

The Headteacher of the Academy will ensure that:

- the Trust's and Academy's policies and procedures, and particularly concerning referrals of cases of suspected abuse and neglect, are effectively implemented, understood and followed by **all** staff;
- sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of pupils;
- allegations made against/concerns raised in relation to teachers including supply teachers, other staff, volunteers and contractors working at the Academy are notified to the local authority Designated Officer (LADO) and that they follow the principles and procedures set out in **Part four of KCSIE** the Trust's 'Policy for dealing with Allegations made against/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors';
- all staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to pupils, and such concerns are addressed sensitively, confidentially and effectively in a timely manner;
- all staff are made aware that they have an individual responsibility to pass on safeguarding concerns and, that if all else fails, to report these directly to the MASH or the Police.