



Hanley and Upton Educational Trust

Safeguarding Children Policy

Stage	Version	V4.0 (31.10.2020)
	Author	Audra Burton
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1	Consulted at Leadership Forum and discussed with LGB Chair	19/10/2020
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4	Uploaded to HCHS School VLE Uploaded to Kempsey School VLE Uploaded to Hanley Swan Primary School VLE Uploaded to Welland Primary School VLE	
5	Next review date	October 2021

Safeguarding Statement COVID-19

Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19). The Hanley and Upton Educational Trust will follow current government guidance to maintain the schools as a safe place for students.

The Hanley and Upton Educational Trust will take reasonable steps to protect staff, pupils and others from coronavirus (COVID-19) within the education setting.

The Hanley and Upton Educational Trust will:

- Continue to maintain high levels of cleanliness to ensure pupils and staff are kept safe.
- Notify county of any outbreaks or positive cases to receive expert assistance and advice.
- Enable track and trace of pupils and staff at risk following an outbreak or positive case.
- Report daily to the DfE when open to report on current attendance.
- Carefully monitor and record X codes and be aware of the current situation in relation to COVID-19.
- Keep parents, students and staff informed of all developments and advice from government to help prevent the spread of the disease.

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>

The Hanley and Upton Educational Trust recognise its moral and statutory responsibility to safeguard and promote the welfare of all of its pupils. We endeavour to provide a safe and welcoming environment where children and young people are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the HUET's safeguarding responsibilities.

Hanley and Upton Educational Trust

Safeguarding Trustee: Kate Taylor

Chair of Trustees: Jeff Robinson

Hanley Castle High School:

Telephone: 01684 593241

Safeguarding Governor: Beulah Pope

Designated Safeguarding Lead: Sarah Anderson-Kirby

Deputy Safeguarding Leads: Sam Cook, Jan Mason and Lindsey Cooke

Prevent Single Point of Contact (SPOC): Sarah Anderson-Kirby

CSE Lead: Sarah Anderson-Kirby

Hanley Swan, St. Gabriel's with St. Mary's CofE Primary School

Telephone: 01684 310364

Safeguarding Governor: Alison Smith and Hilary Aldous

Designated Safeguarding Lead: Adrian Pratley

Deputy Safeguarding Lead/s: Paul Bundy

Prevent Single Point of Contact (SPOC): Adrian Pratley

CSE Lead: Adrian Pratley

Kempsey Primary School

Telephone: 01905 820262

Safeguarding Governor: Jonathan Wallis

Designated Safeguarding Lead: Bryony Baynes

Deputy Safeguarding Lead: David Willetts

Prevent Single Point of Contact (SPOC): Bryony Baynes

CSE Lead: Bryony Baynes

Welland Primary School

Telephone: 01684 310246

Safeguarding Governor: Carol Ibbs

Designated Safeguarding Lead: Margaret Smith

Deputy Safeguarding Lead: Gareth Williams

Prevent Single Point of Contact (SPOC): Margaret Smith

CSE Lead: Margaret Smith

Next review date: October 2020

Other named staff and contacts:

Hanley Castle High School

- Designated Teacher for Children in Care (LAC) Sarah Anderson-Kirby
- Online safety Co-ordinator _____ Sarah Anderson-Kirby

Hanley Swan, St. Gabriel's with St. Mary's CofE Primary School

- Designated Teacher for Children in Care (LAC) Adrian Pratley
- Online safety Co-ordinator Paul Bundy

Kempsey Primary School

- Designated Teacher for Children in Care (LAC) David Willetts
- Online safety Co-ordinator Amandine Stone

Welland Primary School

- Designated Teacher for Children in Care (LAC) Margaret Smith
- Online safety Co-ordinator Gareth Williams / Helen Scrivener

Other named staff and contacts:

- Safeguarding in Education Adviser, WCC: **Denise Hannibal 01905 844436**
- Local Authority Designated Officer/Position of Trust: **Duty Team telephone number: 01905 846221**
- Family Front Door: **01905 822666** (core working hours)

Out of hours or at weekends: **01905 768020**

External Numbers

Police – Prevent Team: DS Stuart Clark	Tel: 01386 591835 Email: stuart.clark@westmercia.pnn.police.uk
Ofsted	Tel: 0300 123 1231
Childline	Tel: 0800 1111
Women’s Aid (24hr. Helpline)	Tel: 0800 980 3331
West Mercia Rape and Sexual Abuse Support Centre	Tel: 01905 724514

To submit an online Cause for Concern notification log onto:
<http://www.worcestershire.gov.uk/childrensocialcare>

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1. Introduction

1.1. The Hanley and Upton Educational Trust fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children. The aim of this policy is to safeguard and promote our pupils' welfare, safety, health and well-being by creating an honest, open, caring and supportive environment. The pupils' welfare is of paramount importance.

1.2. This policy has been developed in accordance with the principles established by the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- Keeping Children Safe in Education 2020 - please see DfE website for the most updated version.
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- West Midlands procedures:
- WCF levels of need guidance:
- Have regard to the DfE statutory guidance 'Relationships education, relationships and sex education (RSE) and health education' (June 2019) by including opportunities in the curriculum, specifically through PSHE and ICT, for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

1.3. Our policy applies to all staff, members, trustees, governors and volunteers working in the Trust. Child protection is the responsibility of all staff. We ensure that all parents and working partners are aware of this policy by mentioning it in our school prospectus, displaying appropriate information in our reception and on the school website and by raising awareness at meetings with parents/carers.

1.4. There will be a Safeguarding Children Policy covering the HUET with each school making amendments to meet local circumstances.

2. Safeguarding Commitment

2.1 HUET Schools adopt an open and accepting attitude towards children as part of their responsibility for pastoral care. HUET Staff encourage children and parents/carers to feel free to talk about any concerns and to see HUET schools as a safe place when there are difficulties. Children's worries and fears will be taken seriously and children are encouraged to seek help from members of staff.

2.2 There are five main elements to our policy:

- Ensuring we practice safer recruitment in checking the suitability of HUET staff and volunteers to work with children. Including identity Right to work, enhanced DBS criminal record and barred list checks (and overseas when required), references and prohibition from teaching or managing schools (s.128). (S.128) for senior leaders in Academies/Independent schools and for Governors in maintained schools (Since September 2018)
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe. Equipping children with the skills they need to stay safe from abuse (including online) and where to go to get help.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse. We respond robustly when concerns are raised or complaints made (from children, adults including parent/carers) as we recognise that this promotes a safer environment and we seek to learn from complaints and comments. HUET schools will act and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible. The HUET school's complaints procedures are available. *(On each school's website in key polices).*
- Supporting pupils who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan. As Education Safeguarding Practitioners we will liaise with the three safeguarding partners in line with Working Together 2018 (updated February 2019)
- Establishing a safe environment in which children can learn and develop. We recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. Other children may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. HUET schools seek to remove any barriers that may exist in being able to recognise abuse or neglect in pupils with Special Educational Needs or Disability. We will seek to provide such children with the necessary support and to build their self-esteem and confidence.

2.3 We recognise that because of the day to day contact with children, academy staff are well placed to identify concerns early and to observe the outward signs of abuse. The schools within the Trust will therefore:

- Establish and maintain an environment where children feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to;
- Ensure children know that there are adults in the school whom they can approach if they are worried;
- Include opportunities in the curriculum, specifically through PSHE and ICT, for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

2.4 We seek to ensure that the child's wishes and feelings are considered when determining what action to take and what services to provide to protect children from harm. To this end we will:

- Ensure there are systems in place for children to express their views and give feedback e.g. through school/class councils, safety questionnaires, participation in anti-bullying and e-safety events;
- Ensure that the child's thoughts/wishes and feelings are sought and recorded on all referrals.

2.5 Children are taught about Safeguarding in the Curriculum additional information about how a variety of safeguarding issues are addressed within the PSHE/SRE and wider curriculum can be found for each school at [Appendix 1](#).

3. Roles and responsibilities

3.1 All HUET staff

All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the school (currently called Designated Safeguarding Leads). HUET staff should be aware that they may need to work with other services as needed and assist in making decisions about individual children.

The Teachers' Standards 2012 state that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their decisions about individual children.

Every member of HUET staff, including volunteers working with children in schools, is advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned and '*think beyond the obvious*'. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to act as outlined in this policy. They take account of the '*one chance rule*' in relation to honour violence-based issues, that an adult may have only one opportunity to save a potential victim.

All HUET staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

The names of the HUET Designated Safeguarding Leads for the current year are listed on **page 1** of this document.

All HUET staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the school's confidential reporting (whistleblowing) policy.

Whistleblowing concerns about the Head teacher in each Primary School within the Trust should be raised with the CEO. Where the whistleblowing concerns regard the CEO, then they should be raised with the Chair of Trustees. These concerns will then be reported directly to the Local Authority Designated Officer (LADO).

HUET Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC whistleblowing helpline](#).

In accordance with the Statutory Guidance "Keeping Children Safe in Education" September 2020, the Board of Trustees and Local Governing Bodies will ensure that:

- HUET schools have a child protection/safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly.
- The policy should be reviewed at least annually or more often, for example in the event of new guidance or a significant incident.
- HUET schools operate safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Head Teachers, a nominated member of the Local Governing Body and other staff involved in the recruitment process have undertaken Safer Recruitment Training.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers/people in a position of trust.
- There is a senior member of each school's leadership team who is designated to take lead responsibility for dealing with child protection (the "Designated Safeguarding Lead") and there is always cover for this role (at least one deputy) with appropriate arrangements for before/after school and out of term activities.

- Designated Safeguarding Leads undertakes effective Local Authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings etc.
- Head Teachers, and all other staff and volunteers who work with children (including early years practitioners within settings on the school site), undertake appropriate training which is regularly updated annually: and that new HUET staff and volunteers who work with children are made aware of the HUET schools' arrangements for child protection and their responsibilities (including this policy and Part 1 of Keeping Children Safe in Education 2020). Training should include indicators of FGM; early signs of radicalisation and extremism; indicators of vulnerability to radicalisation and Child Exploitation.
- Any deficiencies or weaknesses in these arrangements brought to the attention of the Trust or Local Governing Bodies will be rectified without delay.
- The CEO / Chair of Trustees (or, in the absence of a Chair, the Vice Chair) deals with any allegations of abuse made against Head teachers, with advice and guidance from the Local Authority Designated Officer (LADO).
- Effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff and volunteers - "Guidance for Safer Working Practice for those who work with children in education settings October 2015".
- Information is provided to the Local Authority (on behalf of the WSCP) when requested, for example through the Annual Safeguarding Return (e.g. section 175 audit and GET SAFE risk assessment tool.)
- There is an individual member of the Trustees who will champion issues to do with safeguarding children and child protection within HUET schools, liaise with the Designated Safeguarding Leads, and provide information and reports to the Board of Trustees.
- The HUET schools contribute to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" 2018 including providing a co-ordinated offer of Early Help for children who require this. This Early Help may be offered directly through HUET schools' provision or via referral to an external support agency. Safeguarding arrangements consider the procedures and practice of the local authority and the Worcestershire Safeguarding Children Partnership (WCSP).
- The HUET schools comply with all legislative safeguarding duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism. The Head teachers and DSLs should assess the level of risk within the schools and put actions in place to reduce that risk.
- The trustees should ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum.
- There is an individual member of the board of trustees who will champion issues to do with safeguarding children and child protection within the school, liaise with the Designated Safeguarding Lead, and provide information and reports to the board of trustees.
- GDPR- It is important that the trustees are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

3.2 Head teachers of each school in the HUET will ensure that;

- The Safeguarding policies and procedures adopted by the Board of Trustees are effectively implemented and followed by all HUET staff.
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to a child or young person are notified to the Local Authority Designated Officer in a timely manner.
- All HUET staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).
- All HUET 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 Children's Social Care (Children's Services) or the Police.

3.3 The board of trustees should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. **The designated safeguarding lead** should take lead responsibility for safeguarding and child protection. This should be explicit in the role-holder's job description (see Annex B, which describes the broad areas of responsibility and activities related to the role).

- It is a matter for individual schools as to whether they choose to have one or more deputy designated safeguarding leads. Any deputy (or deputies) should be trained to the same standard as the designated safeguarding lead.
- Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.
- The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- During term time, the designated safeguarding lead and/or a deputy should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
- The designated safeguarding lead and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. (WCF Education Safeguarding SLA -DSL annual training)
- In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.
- The names of the Designated Safeguarding Leads for the current year are listed on **page 3** of this document.
- All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the school's confidential reporting (whistleblowing) policy.
- Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors.
- NSPCC's <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/> dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk
- NSPCC - When to call the police
- Statutory guidance contains further information on The Role and Responsibilities of the Designated Teacher

3.4 In addition to the responsibilities listed above, with regard to 14-19 off-site provision, the HUET schools will:

- Ensure that any off-site provider is on the list of approved providers, currently maintained by the Local Authority;
- Ensure it has a nominated member of staff who manages young people accessing off-site provision;

- Ensure that there is an out-of-hours contact for young people receiving their provision away from the school;
- Ensure that appropriate HUET staff have relevant contact details of staff at off-site provision;
- Ensure that relevant information is shared with any off-site learning provider;
- Be aware of the advice of the Worcestershire 14-19 Safeguarding guidance regarding managing the allegations pertaining to off-site provision;
- Ensure due regard to advice for home schools (Worcestershire 14-19 Home School Guidance) relating to safeguarding of young people accessing transport as part of their off-site provision.

4. Records, Monitoring and Transfer

Records relating to actual or alleged abuse or neglect are stored apart from normal pupil or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

Child protection records are stored securely, with access confined to specific HUET staff, e.g. Designated Safeguarding Leads and the Head Teacher.

Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals (eg child who repeatedly goes missing) and ensuring these are acted upon. Each stand-alone file should have a chronology of significant events.

When children transfer school, their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving education setting, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead. Files requested by other agencies e.g. Police, should be copied.

A record of any allegations (proven) made against staff is kept in a confidential file by the HUET Head Teachers.

5. Procedures for Managing Concerns

HUET schools adhere to child protection procedures that have been agreed locally through the Worcestershire Safeguarding Children Board (WSCB) <https://www.safeguardingworcestershire.org.uk/>.

- Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the West Mercia Consortium inter-agency procedures and the WSCP Levels of Need Guidance.
- The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to a HUET school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy designated lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.
- All concerns about a child or young person should be reported without delay and recorded in writing using CPOMS or for those who are not able to access CPOMS, using the agreed template (see Appendix 2 for pro-forma).
- The DSL will consider what action to take and have appropriate discussions with parents/carers prior to referral to children's social care or another agency unless, to do so would place the child at risk of harm or compromise an investigation
- All referrals will be made in line with local procedures as detailed on the Worcester Children First Website.
- If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be

improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head teacher. Concerns should always lead to help for the child at some point.

- HUET Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:
 - the situation is an emergency and the designated senior person, their deputy and the Head teacher are all unavailable;
 - they are convinced that a direct report is the only way to ensure the pupil's safety.
- Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head teacher or the Chair of HUET trustees. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

HUET Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:

- the situation is an emergency and the relevant designated senior person, their deputy and the Head teacher are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety.

Any member of HUET staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the relevant Head teacher or the Board of Trustees. If any member of HUET staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

6. Early Help

Early Help means providing support as soon as a problem emerges, at any point in a child's life.

All HUET staff will be made aware of the local Early Help process and understand their role in it. The Early Help offer will be displayed on each schools' website.

7. Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

Depending on the nature of abuse, HUET schools may need to consider providing measures to protect and support the victim, the alleged perpetrator and other pupils and/or HUET staff in the school by means of a risk assessment. The risk assessment should be recorded and kept under review.

8. Preventing radicalisation

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

- 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.

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

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

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

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

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

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

The Prevent duty

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

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations.

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

There is additional guidance: [Prevent duty guidance: for further education institutions](#) in England and Wales that applies to colleges.

Channel

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

The Home Office has developed three e-learning modules:

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

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation. For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction

to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

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

9. Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police¹.

The duty applies to all persons in HUET schools who are employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

Concerns about FGM outside of the mandatory reporting duty should be reported as per HUET schools' child protection procedures. HUET staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of HUET staff should examine a girl.

10. Children with additional vulnerabilities

There are many children who have additional needs or whose living arrangements may mean that they are more vulnerable to harm, for example children with special educational needs, disabled children, children in public care or privately fostered children. It is essential that the HUET schools know who shares parental responsibility for children and has effective relationships with partner agencies in relation to these children (for example, Virtual School for Children in Care).

The HUET schools will ensure that staff have sufficient knowledge and guidance so that they are aware of the additional challenges faced by these children and the impact of their additional vulnerabilities. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration; no single point of contact for the school as a child has a number of care-givers and involved professionals; assumptions that state approved care-givers are providing safe care for the child; communication needs of a child which can lead to over reliance on parental accounts and interpretations.

The HUET will always consider extra pastoral support for children with SEND to address these additional challenges.

Alternative provision

¹ <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

HUET schools will remain responsible for a pupil's welfare during their time at an alternative provider.

When placing a pupil with an alternative provider, HUET schools will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

11. Children Missing Education

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation or could be linked to trafficking.

The HUET DSLs will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'². HUET staff are made aware of these procedures at induction and through our Attendance policy (HUET Attendance Policy). Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

All HUET staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. HUET staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage and the particular vulnerabilities of looked after children who go missing.

http://www.worcestershire.gov.uk/info/20595/behaviour_and_attendance/293/children_missing_education

12. Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

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. Exposure to 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.

See Appendix 4

13. Operation Encompass

HUET schools are receiving Operation Encompass Notifications.

Operation Encompass exists to highlight that a Domestic Abuse Incident has taken place and the police have been called. It is about keeping an eye on changed behaviour and logging anything out of the ordinary.

Operation Encompass is working really well in Worcestershire Schools and Worcestershire Children First have successfully notified over 5500 incidents. All this is great news for children and their families. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform Worcestershire Children First, who in turn inform the specific School (usually the Designated Safeguarding Lead) before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

² <https://www.gov.uk/government/publications/children-missing-education>

14. Protecting children accessing IT in school

The HUET trustees should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their schools have appropriate filters and monitoring systems in place.

Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, the HUET trustees should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: **UK Safer Internet Centre: appropriate filtering and monitoring.**

Guidance on e-security is available from the [National Education Network](#). Support for schools is available via the: [schools' buying strategy](#) with specific advice on procurement here: [buying for schools](#).

Whilst filtering and monitoring is an important part of the online safety picture for schools to consider, it is only one part. The HUET trustees should consider a whole school or college approach to online safety. This will include a clear policy on the use of mobile technology in the school or college. Many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G in particular and the school and college should carefully consider how this is managed on their premises.

Whilst it is essential that the trustees ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

Education at home

Where children are being asked to learn online at home the department has provided advice to support schools and colleges do so safely: [safeguarding-in-schools-colleges-and-other-providers and safeguarding-and-remote-education](#)

15. Photography and use of images (including hand held devices)

The welfare and protection of children in HUET schools is paramount and consideration should always be given to whether the use of photography will place children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.

For this reason, consent is always sought when photographing children using any means and including iPads, smart phones or cameras and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).

Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

16. Online Safety/Sexting

HUET schools have a robust approach to promoting safety through the curriculum. The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. (Sexting) Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.

- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'³.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly.

If a member of HUET staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of HUET staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate HUET school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

Immediate referral at the initial review stage should be made to Family Front Door/Police if

- the incident involves an adult;
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- The imagery involves sexual acts;
- The imagery involves anyone aged 12 or under;
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If these factors are not present, then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without escalation to Family Front Door or the police.

In applying judgement as to management within HUET schools or referral in line with child protection procedures, the following factors may be relevant.

- there is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- capacity of child and understanding of consent;
- the situation is isolated or if the image been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- there are previous similar incidents.

³https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/545997/Sexting_in_schools_and_colleges_UK_CCIS_4_.pdf

17. Allegations against staff

All HUET staff should be mindful of the position of trust that they are in when working within an education setting. They need to comply with guidance about conduct and safe practice, including safe use of mobile phones.

Pupils' allegations or concerns about HUET staff conduct will be taken seriously and followed up in a transparent and timely way.

If an allegation is made which indicates a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. Where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

the member of HUET staff receiving the allegation will immediately inform the Head teacher, unless the allegation concerns the Head teacher, in which case the Head teacher of the CEO will be informed immediately. Where the allegation concerns the CEO, it will be reported directly to Chair of Trustees and /or the Local Authority Designated Officer (LADO).

The Head teacher, CEO or Chair of Trustees on all such occasions will discuss the content of the allegation with LADO, prior to undertaking any investigation.

HUET schools will follow the DfE and West Mercia procedures [LA procedures](#) for managing allegations against staff, a copy of which is available in school.

The Head teacher, CEO or Chair of Trustees will be guided by the LADO and an HR consultant when considering suspension or other neutral protective steps.

Publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law; this includes verbal conversations or written material including content placed on social media sites.

Members of staff, supply staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

All HUET Schools as employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the school are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers, see paragraphs on supply teachers below). It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Supply Teachers

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency'). Whilst schools are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The HUET trustees should discuss with the agency whether it is appropriate

to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the HUET trustees when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are considered by the school during the investigation. When using an agency, schools should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

18. Managing Professional Disagreements

On occasions there will be disagreements between professionals as to how concerns are handled and these can impact on effective working relationships. HUET schools will support staff to promote positive partnerships within schools and with other agencies and will ensure that HUET **staff** are aware of how to escalate concerns and disagreements if appropriate and use the WSCP escalation procedures⁷ if necessary.

<http://westmidlands.procedures.org.uk/local-content/4gjN/escalation-policy-resolution-of-professional-disagreements>

19. The use of 'reasonable force' in schools and colleges

HUET schools have Behaviour Policies which outline each school's recognised sanctions and rewards. There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

- Departmental advice for all schools is available <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

- Advice for colleges is available on the AOC website. <https://www.aoc.co.uk/>

20. Modern Slavery

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL will then contact the NCA.

21. Information Sharing & Confidentiality

We recognise that all matters relating to child protection are confidential.

The relevant Head teacher or DSL will disclose any information about a pupil to other members of HUET staff on a need to know basis only.

All HUET staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All HUET staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

22. Communication with Parents

HUET schools recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.

HUET schools will always undertake appropriate discussion with parents prior to involvement of another agency **unless to do so would place the child or an adult at further risk of harm or would impede a criminal investigation.**

HUET schools will ensure that parents understand the responsibilities placed on the school and staff to safeguard children and their duty to co-operate with other agencies in this respect.

23. Supporting and Supervision of Staff

We recognise that staff working in the Trust who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

HUET schools will support such staff by providing an opportunity to talk through their anxieties with the relevant DSL and to seek further support such as counselling or regular supervision, as appropriate.

HUET schools will enable supervision for the relevant DSL through network meetings, direct consultation with the Safeguarding in Education Adviser or Consultant Social Workers in order to promote best practice and challenge unsatisfactory or poor practice.

In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, HUET staff will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

24. Whistleblowing

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

HUET staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the relevant school's confidential reporting (whistleblowing) policy.

Whistleblowing concerns about the Head teacher of a Primary School should be raised with the CEO. Where the concern is about the CE, it should be reported directly to the Chair of Trustees / Local Authority Designated Officer (LADO).

HUET staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC whistleblowing helpline](#).

25. Health & Safety

HUET schools' Health & Safety policies, set out in a separate document, reflect the consideration we give to the safeguarding of our children both within the school environment and when away from the school, for example when undertaking school trips and visits.

Risk Assessments are undertaken and reviewed regularly, for example in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour and risk to and from children displaying harmful behaviour.

Safe Environment

HUET schools undertake appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.

HUET schools have adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours.

Visitors to HUET schools, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

26. Contextualised Safeguarding

All HUET staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

27. Mental Health

All HUET 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 children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

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

The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

28. Inspection

Since September 2019, Ofsted's inspections of early years, schools and post-16 provision are carried out under Ofsted's Education Inspection Framework. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.

In addition to the framework and inspections handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: [Inspecting safeguarding in early years, education and skills settings](#).

The Independent Schools Inspectorate (ISI) is approved to inspect certain independent schools and will also report on safeguarding arrangements. ISI has a published framework which informs how it inspects at Independent Schools Inspectorate.

29. Other Relevant Policies

The Trustees' statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures.

The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies in the schools within the Trust, for instance:

- Staff Behaviour / Staff Code of Conduct

- Allegations of Abuse against Teachers and other Staff
- Complaints Procedure
- Behaviour Management
- Anti-Bullying, including cyber-bullying
- Positive Physical Intervention
- Special Educational Needs
- Trips and visits
- Work experience and extended work placements
- First aid and the administration of medicines
- Health and Safety
- Intimate Care
- Sex and Relationships Education
- Safe and Appropriate Use of Images
- Equal Opportunities
- E-safety and Acceptable Internet Use
- Whistleblowing (Confidential Reporting)
- Preventing Extremism and Radicalisation

The above list is not exhaustive but when undertaking development or planning of any kind the school will need to consider safeguarding matters.

APPENDIX 1

Safeguarding in the Curriculum

Each school will publish their wider safeguarding provision taking account of the following areas. Children are taught about safeguarding in schools. The following areas are among those addressed in PSHE/SRE and in the wider curriculum.

- Bullying/Cyber Bullying
Add examples of how you teach about bullying-Bullying week etc.
- Drugs, Alcohol and Substance Abuse
Add examples of how you teach about Drugs, Alcohol and Substance Abuse
- Online Safety / Mobile technologies
Add examples of how you teach about Online Safety / Mobile technologies
- Stranger Danger
Add examples of how you teach about Stranger Danger
- Fire and Water Safety
Add examples of how you teach about Fire and Water Safety
- Peer to Peer Abuse
Add examples of how you teach about Peer to Peer Abuse
- Sexual Violence and Sexual Harassment
Add examples of how you teach about Sexual Violence and Sexual Harassment
- Road Safety
Add examples of how you teach about Road Safety
- Domestic Abuse
Add examples of how you teach about Domestic Abuse
- Healthy Relationships / Consent
Add examples of how you teach about Healthy Relationships / Consent
- So called Honour Based Violence issues (HBV) e.g. Forced Marriage, Female Genital Mutilation (FGM)
Add examples of how you teach about So called Honour Based Violence issues (HBV) e.g. Forced Marriage, Female Genital Mutilation (FGM)
- Sexual Exploitation of Children (CSE)
Add examples of how you teach about Sexual Exploitation of Children (CSE)
- Extremism and Radicalisation (in line with the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)⁴.
Add examples of how you teach about Prevent

Within our local area statistics show in August 2019 that Anti-social behaviour and violent or sexual crime are the two highest crimes committed and therefore, are particular focus for our school. Data taken from <https://www.crime-statistics.co.uk>

⁴https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

Appendix 2 – Form 1

Logging a Concern about a Child’s Safety and Welfare – all staff and visitors

Name:	D.o.b:	Tutor group:
Date:	Time:	
Name of person logging concern:	
Print	Signature	
Position:		
Note the reason(s) for recording the incident.		
Details of concern/incident - record the who/what/where/when factually (continue on reverse of sheet if necessary):		
Any other relevant information (witnesses, immediate action taken)		
Action taken:		
Reporting staff signature Date		
Designated Safeguarding Lead – Response/Outcome:		
DSL signature Date		

Check to make sure your report is clear now - and will also be clear to a stranger reading it next year.

PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD

FORM 1

Continuation Sheet Incident /Concern; other relevant information; Action Taken; Outcome	
PUPIL NAME:	
DATE	DETAILS
Signature	

APPENDIX 3 - Key Information for all staff

Recognition & Identification of Abuse

Definitions taken from Working Together to Safeguard Children 2018, Appendix A

What is abuse?

Abuse and neglect are forms 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. They may be abused by an adult or adults, or another child or children.

Indicators of Abuse

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing the circumstances of any child any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

EMOTIONAL ABUSE

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Emotional abuse is difficult to:

- define
- identify/recognise
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism
- Extremes of passivity or aggression
- Children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present
- Babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding
- Toddler/Pre-School – head banging, rocking, bad temper, 'violent', clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills
- School age – Wetting and soiling, relationship difficulties, poor performance at school, non-attendance, antisocial behaviour. Feels worthless, unloved, inadequate, frightened, isolated, corrupted and terrorised
- Adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive and delinquent behaviour

- Child may be underweight and/or stunted
- Child may fail to achieve milestones, fail to thrive, experience academic failure or under achievement
- Also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability

NEGLECT

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

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Neglect can often fit into six forms which are:

- Medical – the withholding of medical care including health and dental.
- Emotional – lack of emotional warmth, touch and nurture
- Nutritional – either through lack of access to a proper diet which can affect in their development.
- Educational – failing to ensure regular school attendance that prevents the child reaching their full potential academically
- Physical – failure to meet the child's physical needs
- Lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger.⁵

Common Concerns:

With regard to the child, some of the regular concerns are:

- The child's development in all areas including educational attainment
- Cleanliness
- Health
- Children left at home alone and accidents related to this
- Taking on unreasonable care for others
- Young carers

Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person. It is important to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability. This can be a consequence of:

- Poor health, including mental health or mental illness
- Disability, including learning difficulties
- Substance misuse and addiction
- Domestic violence

School staff need to consider both acts of *commission* (where a parent/carer deliberately neglects the child) and acts of *omission* (where a parent's failure to act is causing the neglect). This is a key consideration with regard to school attendance where parents are not ensuring their child attend school regularly.

Many of the signs of neglect are visible. However, school staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a pupil is being neglected. Children spend considerable time in school so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

⁵ Source: Horwath, J (2007): Child neglect: identification and assessment: Palgrave Macmillan

Here are some signs of possible neglect:

Physical signs:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- The child seems underweight and is very small for their age
- The child is poorly clothed, with inadequate protection from the weather
- Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are crucially important
- Signs of malnutrition include wasted muscles and poor condition of skin and hair. It is important not to miss an organic cause of failure to thrive; if this is suspected, further investigations will be required
- Infants and children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment
- Failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any disability

Behavioural signs:

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- If they are often absent from school for no apparent reason
- If they are regularly left alone, or in charge of younger brothers or sisters
- Lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks
- Craving attention or ambivalent towards adults, or may be very withdrawn
- Delayed development and failing at school (poor stimulation and opportunity to learn)
- Difficult or challenging behaviour

PHYSICAL ABUSE

Physical abuse 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.

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the police and/or Children's Services in order to safeguard the child.

Staff must be alert to:

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern, child too young for the activity described.

Physical signs:

- Bald patches
- Bruises, black eyes and broken
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen

- Scalds and burns
- General appearance and behaviour of the child may include:
 - Concurrent failure to thrive: measure height, weight and, in the younger child, head circumference;
 - Frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.
- Bruising:
 - Bruising patterns can suggest gripping (finger marks), slapping or beating with an object.
 - Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.
- Other injuries:
 - Bite marks may be evident from an impression of teeth
 - Small circular burns on the skin suggest cigarette burns
 - Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
 - Red lines occur with ligature injuries
 - Retinal haemorrhages can occur with head injury and vigorous shaking of the baby
 - Tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate.
 - Fractured ribs: rib fractures in a young child are suggestive of non-accidental injury
 - Other fractures: spiral fractures of the long bones are suggestive of non-accidental injury

Behavioural signs:

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- Fear of suspected abuser being contacted
- Injuries that the child cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

SEXUAL ABUSE

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

Sexual abuse is usually perpetrated by people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, people working with the child in school or through other activities.

Characteristics of child sexual abuse:

- It is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites;
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.

In young children behavioural changes may include:

- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Being overly affectionate - desiring high levels of physical contact and signs of affection such as hugs and kisses
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
- They may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age
- Starting to wet again, day or night/nightmares

In older children behavioural changes may include:

- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism
- Genital discharge or urinary tract infections
- Marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically
- The child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
- The child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person
- Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

Physical signs and symptoms for any age child could be:

- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Stomach pains or discomfort walking or sitting
- Sexually transmitted infections
- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
- Soreness, itching or unexplained bleeding from penis, vagina or anus
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
 - Understanding that is proposed based on age, maturity, development level, functioning and experience
 - Knowledge of society’s standards for what is being proposed
 - Awareness of potential consequences and alternatives
 - Assumption that agreements or disagreements will be respected equally
 - Voluntary decision
 - Mental competence
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

APPENDIX 3 - Key Information for all staff

Child Sexual Exploitation (CSE) and harmful sexual behaviours

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any 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. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

The department provides a guidance in: [Child sexual exploitation: guide for practitioners](#)

The DSL will use the Worcester Safeguarding Children's Board CSE Screening Tool⁶ on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identifies any level of concern the DSL should contact their local Missing and Child Sexual Exploitation Forum and email the completed CSE Screening Tool along with a Family Front Door (FFD) Cause for Concern form. If a child is in immediate danger the police should be called on 999.

Sexual harassment

Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment includes:

- Sexual comments.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against another pupil.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual violence

Sexual violence refers to the three following offences:

- **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.

⁶ http://www.worcestershire.gov.uk/info/20054/safeguarding_children/273/child_sexual_exploitation_pathway

- **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.

Harmful sexual behaviours

The term **harmful sexual behaviour** is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Inappropriate touching.
- Sexual violence or threats.

Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not).

Peer on Peer abuse

Sexual violence and sexual harassment between children in schools and colleges

Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- 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 behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

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

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

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

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.

Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include: non-consensual sharing of sexual images and videos;

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and upskirting.

Upskirting

The Voyeurism (Offences) Act, 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 gender, can be a victim.

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

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy). Additional advice and support

- 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

On page 95 of KCSIE September 2020, you will find further advice and support.

APPENDIX 3 - Key Information for all staff

Child Criminal Exploitation - County Lines and managing criminal acts

What is County Lines?

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] 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, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹⁰³ 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.

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

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

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 (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

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

Crimes Associated with County Lines

Drugs

County lines commonly involves the illegal distribution and dealing of seriously dangerous drugs from one city/town to another. The most common drugs involved are heroin and cocaine (crack and powder), but also MDMA, cannabis, amphetamines and spice.

Violence

Gangs sometimes use violence to threaten children and young people when recruiting them. Gangs also violently assault children and young people working for them if they find their drugs or money to be missing. Weapons such as firearms, knives, bats, acid are sometimes used to make violent threats.

Exploitation

Gangs recruit and use children and young people to move drugs and money for them. Children as young as 11 years old are recruited, often using social media. They are exploited and forced to carry drugs between locations, usually on trains or coaches. They are also forced to sell drugs to local users.

Sexual Exploitation

Young girls are often groomed and forced into relationships with gang members and are made to perform sexual acts.

Signs to look out for

A young person's involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs.

- Are they always going missing from school or their home?
- Are they travelling alone to places far away from home?
- Do they suddenly have lots of money/lots of new clothes/new mobile phones?
- Are they receiving much more calls or texts than usual?
- Are they carrying or selling drugs?
- Are they carrying weapons or know people that have access to weapons?
- Are they in a relationship with or hanging out with someone/people that are older and controlling?
- Do they have unexplained injuries?
- Do they seem very reserved or seem like they have something to hide?
- Do they seem scared?
- Are they self-harming?

Terms associated with County Lines

Here are some words/terms that are commonly used when describing county lines activity. someone using these words might be involved in or might know of County Lines activity.

Cuckooing

Cuckooing is when drug gangs take over the home of a vulnerable person through violence and intimidation, using it as their base for selling/manufacturing drugs.

Signs of cuckooing:

- An increase in people coming and going
- An increase in cars or bikes outside
- Litter outside
- Signs of drugs use
- You haven't seen the person who lives there recently or when you have, they have been anxious or distracted.

Going Country

This is the most popular term that describes County Lines activity. It can also mean the act of travelling to another city/town to deliver drugs or money.

Trapping

The act of selling drugs. Trapping can refer to the act of moving drugs from one town to another or the act of selling drugs in one.

Trap House

A building used as a base from where drugs are sold (or sometimes manufactured). These houses usually are occupied by someone (usually adult drug users) but sometimes young people are forced to stay in trap houses.

Trap line

This refers to when someone owns a mobile phone specifically for the purpose of running and selling of drugs.

What to do if you have concerns a young person is involved in County Lines

Follow your normal safeguarding procedures and refer to your school's DSL. The DSL will refer on to Children's Social Care and/or the Police, if the young person is at immediate risk of harm.

Further information is available in the regional guidance of the [West Midlands Child Protection Procedures](#).⁷

Further guidance is available in the Home Office's publication '[County Lines: criminal exploitation of children and vulnerable adults](#)'.⁸

16. Managing criminal acts

Bail conditions

Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks.

The school will work with CSCS and the police to support the victim, alleged perpetrator and other children (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.

The term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail.

Where bail is deemed necessary, the school will work with CSCS and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education.

Managing delays in the criminal justice system

The school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made.

The relevant DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable.

The school will support the victim and perpetrator to remain protected from bullying and harassment (including online).

Where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support.

The alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience.

Ongoing support for the victim

Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the school uses to describe the victim
- The age and developmental stage of the victim

⁷ <http://westmidlands.procedures.org.uk/pkpzs/regional-safeguarding-guidance/children-affected-by-gang-activity-and-youth-violence>

⁸ <https://www.gov.uk/government/collections/county-lines-criminal-exploitation-of-children-and-vulnerable-adults>

- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like

Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation.

HUET schools will provide a physical space for victims to withdraw to.

Victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies.

Everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made.

If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents.

If the victim does move to another school, the relevant DSL will inform the school of any ongoing support needs and transfer the child protection file.

Ongoing support for the alleged perpetrator

When considering the support required for an alleged perpetrator, HUET schools will consider:

- The terminology they use to describe the alleged perpetrator or perpetrator.
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.

Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.

When deciding, advice will be taken from CSCS, specialist sexual violence services and the police as appropriate.

If the alleged perpetrator moves to another school (for any reason), the relevant DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

HUET schools will work with professionals as required to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.

HUET schools will make such decisions on a case-by-case basis, with the relevant DSL taking a leading role. HUET schools will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and CSCS will be consulted where necessary.

HUET schools will also consider whether circumstances make it unreasonable or irrational for the school to decide about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time.

HUET schools will be clear whether action taken is disciplinary, supportive or both.

Shared classes

Once the relevant DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the pupil will always come first.

Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would 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 school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

In all cases, HUET schools will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

In most sexual violence cases, HUET schools will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

HUET schools will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

HUET schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The relevant DSL or a deputy will attend such meetings, with agencies invited as necessary.

Clear policies regarding how HUET schools will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding other children

Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support.

It is likely that children will "take sides" following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

HUET schools will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.

As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. HUET schools will consider any additional support that can be put in place.

APPENDIX 3 - Key Information for all staff

Looked after children and previously looked after children Private fostering

Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. HUET schools ensure that staff have the necessary skills, knowledge and understanding to keep looked after children safe. Appropriate HUET staff have information about a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They also have information about the child's care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the relevant DSL have details of the child's social worker and the name and contact details of the Local Authority's Virtual Head for children in care and previously looked after children.

We recognise that a previously looked after child potentially remains vulnerable and therefore ensure that all staff have the skills, knowledge and understanding to keep previously looked after children safe.

Each HUET school's designated teacher for looked after children and previously looked after children has the appropriate training and the relevant qualifications and experience of working with this group of children.

The relevant DSL will obtain details of the local authority Personal Adviser appointed to guide and support each care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Private Fostering

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible. If we become aware of a privately fostering arrangement, we will check that Children's Services have been informed.

APPENDIX 3 - Key Information for all staff

Honour based violence, forced marriage and breast ironing

'Honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

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

Actions

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

FGM mandatory reporting duty for teachers

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

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.¹⁰⁵ Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmfu@fco.gov.uk.

Breast ironing

What is breast ironing?

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

Why does breast ironing happen?

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

Breast ironing is physical abuse

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Breast Ironing in the UK

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. Keeping Children Safe in Education (2018) mentions breast ironing on page 80, as part of the section on so-called 'honour-based' violence. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

What should schools do?

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the Police as required by the mandatory reporting duty. Schools should not:

- Contact the parents before seeking advice from children's social care;
- Make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

The 'one chance' rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or act to silence her.

APPENDIX 3 - Key Information for all staff

Homelessness

22. Homelessness

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

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

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

APPENDIX 3 - Key Information for all staff

Alternative provision

Homestay exchange visits

School-arranged homestays in UK

Where HUET schools are arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay.

In such cases, HUET schools are the regulated activity provider; therefore, each school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, each school will consider, alongside all other information, whether the adult is a suitable host.

In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

School-arranged homestays abroad

HUET schools will liaise with partner schools to discuss and agree the arrangements in place for the visit.

HUET schools will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.

HUET schools will use their professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange.

Pupils will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

Privately arranged homestays

Where a parent or pupil arranges their own homestay, this is a private arrangement and HUET schools are not the regulated activity provider.

Work experience

When a pupil is sent on work experience, HUET schools will ensure that the provider has appropriate safeguarding policies and procedures in place.

APPENDIX 4

Supporting Domestic Violence

What schools can do

Schools can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.

For many victims, the school might be the one place that they visit without their abusive partner.

It would help if schools displayed posters or had cards/pens available with information about domestic abuse and contact details for useful agencies: for example, NSPCC **0800 800 5000** and ChildLine **0800 11 11**; Parentline **0800 800 2222**; Worcestershire's Forum Against Domestic Abuse and Sexual Violence (WFADSA) 24 hr. helpline: **0800 980 3331**, website: <http://www.worcestershire.gov.uk/cms/domestic-and-sexual-abuse.aspx>

West Mercia Women's Aid 24hr helpline 0800 980 3331

West Mercia Constabulary - Police Domestic Abuse Units 101.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by schools as part of the whole school ethos.

Schools can support individual children and young people by:

- Introducing a **whole-school philosophy** that domestic abuse is unacceptable;
- **Responding to disclosures** and potential child protection concerns; recognising that domestic abuse and forced marriage may be a child protection concern; policies and procedures must include domestic abuse;
- **Giving emotional support** – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.;
- **Facilitating a peer support network** – children and young people can become isolated but often welcome talking to friends about their problems;
- **Offering practical support** – if children or young people are new to the school they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.;
- **Providing somewhere safe and quiet** to do their homework or just to sit and think;
- **Improving the self-esteem and confidence** of children and young people by:
 - offering them opportunities to take on new roles and responsibilities;
 - offering tasks which are achievable and giving praise and encouragement;
 - monitoring their behaviour and setting clear limits;
 - criticising the action, not the person;
 - helping them to feel a sense of control in their school lives;
 - involving them in decision making;
 - helping them to be more assertive;
 - respecting them as individuals;
 - encouraging involvement in extra-curricular activities.

From The Expect Respect Education Toolkit – Women's Aid

Operation Encompass

Operation Encompass is to highlight that a Domestic Abuse Incident has taken place and the police have been called or visited the family home. It is about keeping an eye on changed behaviour and logging anything out of the ordinary. Our school receives Operation Encompass notifications via WCC Children's Portal daily from

West Mercia Police. All parents have received or will receive a letter informing them on how we use Operation Encompass notifications.

The DSL's responsibility – the DSL should:

- The link to the children's portal is: https://capublic.worcestershire.gov.uk/Chs_Portal/HomePage.aspx
- View the Operation Encompass website (www.operationencompass.org) for further information;
- Ensure the Safeguarding Education Adviser has up to date contact information;
- Ensure the Operation Encompass referral record document is retained in the same way as other child protection documents, in a secure place;
- Identify and brief a colleague who can deputise in his/her absence;
- Ensure that all teaching staff are aware of Operation Encompass and understand the confidential nature of any information passed to them and that this information must be treated in the same way as any other child protection information;
- Inform parents that the school is part of Operation Encompass (using the template letter supplied);
- Inform the Governing Body that the school is part of Operation Encompass and the Governor with responsibility for safeguarding should have a working knowledge of the principles;
- Include details of Operation Encompass in the school prospectus and on the school website to ensure that all new parents are informed of the school's involvement.
- Consider displaying Operation Encompass posters around the school.

On receiving a Domestic Abuse notification, the DSL should:

- complete the Operation Encompass referral record
- notify class teachers or year leaders
- If there's no change to the child's behaviour - just monitor and log the DA
- If the child displays poor behaviour choices /seems upset/withdrawn, offer the relevant support needed

Bear in mind

- Victim of incident may be anxious that the information will be shared inappropriately.
- Notification may not give details as to which parent is the perpetrator/victim – any disclosure to the 'wrong' parent could heighten risk.
- Need to be aware who is 'connected' to the child – e.g. TA/lunchtime supervisor may be child's relative / friend of the family.
- **Inappropriate sharing of information could heighten the risk for the victim and/or the child.**

If in doubt, consult with the Family Front Door (01905 822666)

APPENDIX 5

Safer Recruitment and DBS checks – policy and procedures

HUET schools will record all information on the checks carried out in the relevant school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

The SCR will be monitored and checked by the DSL/HT/Safeguarding Trustees on a regular basis, throughout the academic year: Example half termly

Appointing new staff

When appointing new staff, HUET schools will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (**section 128**) direction made by the secretary of state
- Ask for written information about previous employment history and check that information is not contradictory or incomplete.
- Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: [Disqualification under the Childcare Act 2006 \(August 2018\)](#).

HUET schools will seek references on all short-listed candidates, including internal candidates, before interview. HUET schools will scrutinise these and resolve any concerns before confirming appointments.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, HUET schools will carry out all the relevant checks as if the individual was a new member of staff. HUET schools will also do this if an individual moves from a post that is not regulated activity to one that is.

HUET schools will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

HUET schools will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. HUET schools will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

HUET schools will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
 - An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- HUET schools will obtain the DBS check for self-employed contractors.

HUET schools will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

HUET schools will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by HUET schools, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, HUET schools will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

HUET schools will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

Governance

Before an individual becomes either the proprietor of an independent school or the chair of a body of people which is the proprietor of an independent school, the Secretary of State will:

- carry out an enhanced DBS check; and obtain an enhanced DBS certificate where applicable (either including or not including barred list information as appropriate);
- confirm the individual's identity; and
- if the individual lives or has lived outside of the UK, where making an enhanced check is insufficient, such other checks as the Secretary of State considers appropriate.

The Secretary of State also undertakes these checks in respect of the chair of governing bodies of non-maintained special schools.

The requirement for an enhanced DBS check and certificate is disapplied for the chair of an academy trust if the academy is converting from a maintained school and the person has already been subject to a check carried out by the local authority.

Where the proprietor is a body of people (including a governing body in an academy or free school), the chair must ensure that enhanced DBS checks are undertaken, for the other members of the body and that where such a check has been undertaken, an enhanced DBS certificate is obtained, and that identity checks are completed before, or as soon as practicable after, any individual takes up their position. The chair must also ensure that other members are not subject to a section 128 direction that would prevent them from taking part in the management of an independent school (including academies and free schools). Further checks, as the chair considers appropriate, should be undertaken where, by reason of the individual's living or having lived overseas, obtaining an enhanced DBS certificate is not sufficient to establish his or her suitability to work in a school.

In the case of an academy trust, including those established to operate a free school, the trust must require enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees. Academy trusts, including those established to run a free school, have the same responsibilities as all independent schools in relation to requesting enhanced DBS certificates for permanent and supply staff. Where an academy trust delegates responsibilities to any delegate or committee (including a local governing body), the trust must require DBS checks on all delegates and all member of such committees. Academy trusts must also check that members are not barred from taking part in the management of the school as a result of a section 128 direction.

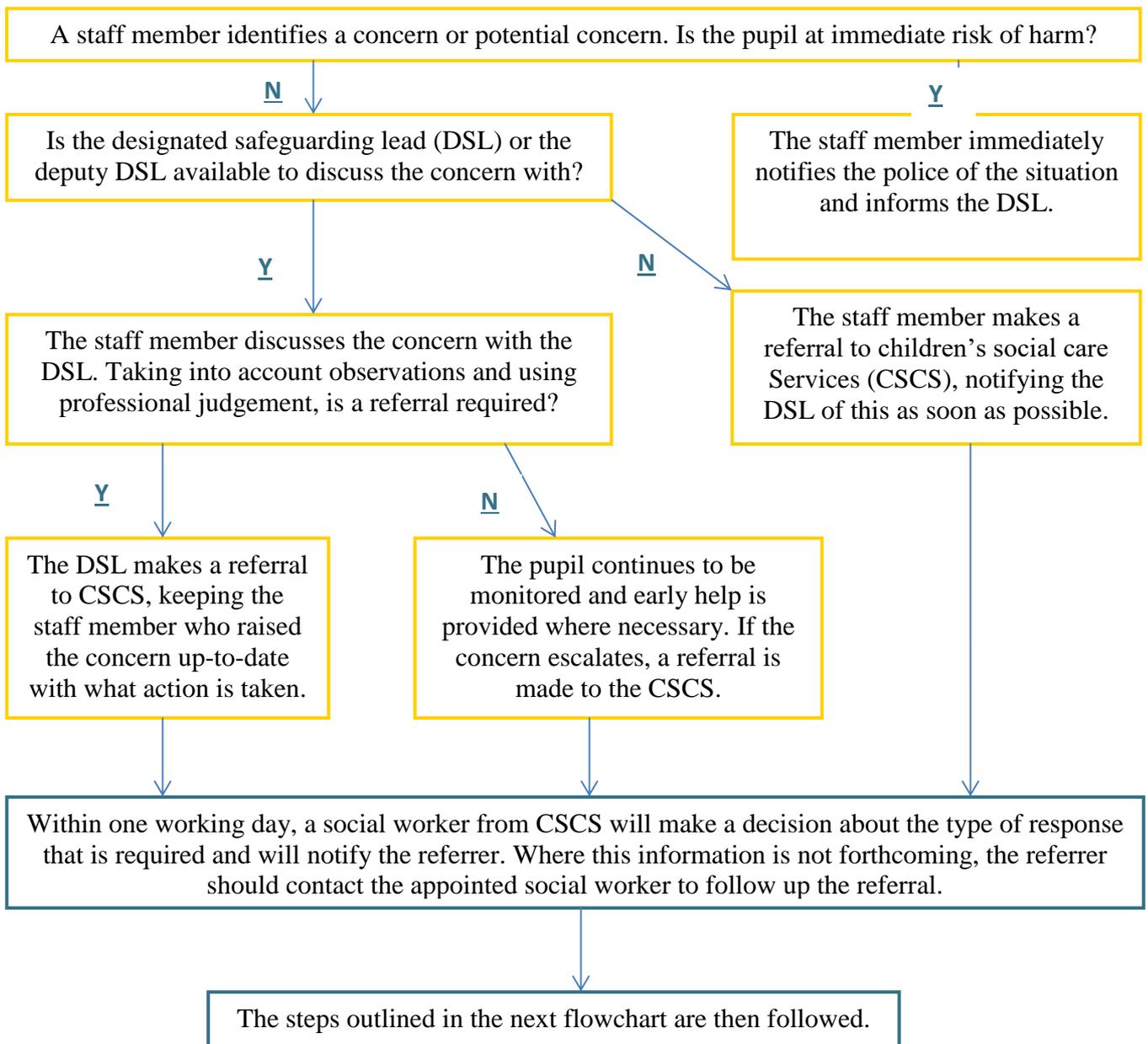
APPENDIX 6

Safeguarding Reporting Process

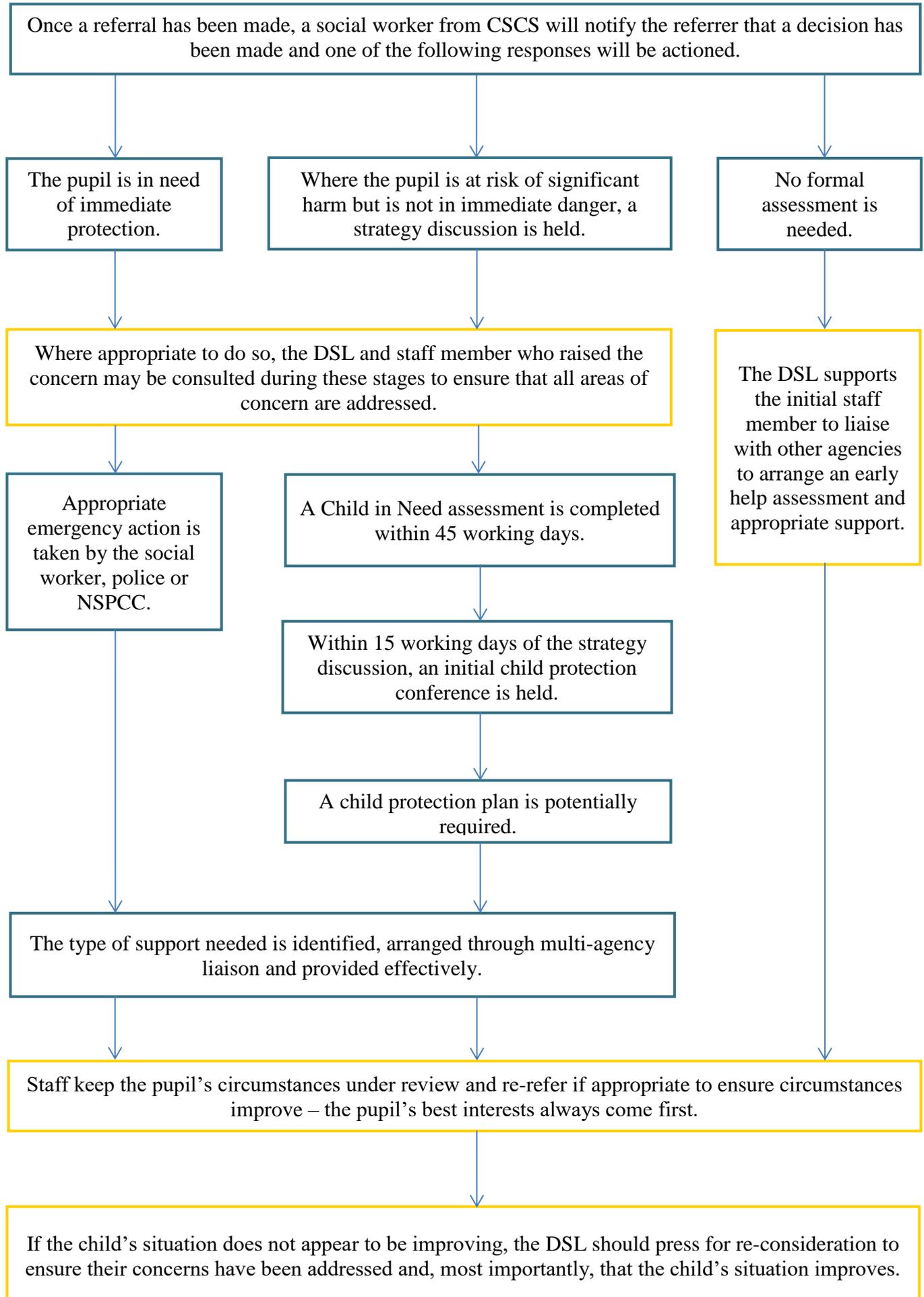
The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed.

The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made



After a referral is made



APPENDIX 7

Contacts – delete as necessary.

Internal	
Headteacher Mrs Lindsey Cooke	Tel: 01684 593241 Email: CookeL@hanleycastlehs.org.uk
DSL Sarah Anderson-Kirby	Tel: 01684 593241 Email: AndersonKirbyS@hanleycastelhs.org.uk
Deputy DSL Sam Cook / Jan Mason	Tel: 01684 593241 Email: CookS@hanleycastlehs.org.uk / MasonJ@hanleycastelhs.org.uk
Chair of local Governing Body Kate Taylor	Tel: 01684 593241 Email: chair@hanleycastlehs.org.uk
Safeguarding Governor Beulah Pope	Tel: 01684 593241 Email: PopeB@hanleycastlehs.org.uk
Internal	
Headteacher Adrian Prately	Tel: 01684 310364 Email: head@hanleyswanps.org.uk
DSL Adrian Prately	Tel: 01684 310364 Email: head@hanleyswanps.org.uk
Deputy DSL Paul Bundy	Tel: 01684 310364 Email: PBundy@hanleyswanps.org.uk
Chair of local Governing Body Kate Taylor	Tel: 01684 593241 Email: chair@hanleycastlehs.org.uk
Safeguarding Governor Hilary Aldous	Tel: 01684 310364 Email: HAldous@hanleyswanps.org.uk
Internal	
Headteacher Bryony Baynes	Tel: 01905 820262 Email: bbaynes@kempseyyps.org.uk
DSL Bryony Baynes	Tel: 01905 820262 Email: bbaynes@kempseyyps.org.uk
Deputy DSL David Willetts	Tel: 01905 820262 Email: DWilletts@kempseyyps.org.uk
Chair of local Governing Body Kate Taylor	Tel: 01684 593241 Email: chair@hanleycastlehs.org.uk
Safeguarding Governor Jonathan Wallis	Tel: 01905 820262 Email: JWallis@kempseyyps.org.uk
Internal	
Headteacher Margaret Smith	Tel: 01684 310246 Email: head@wellandprimary.worcs.sch.uk
DSL Margaret Smith	Tel: 01684 310246 Email: head@wellandprimary.worcs.sch.uk
Deputy DSL Gareth Williams	Tel: 01684 310246 Email: gjw38@wellandprimary.worcs.sch.uk
Chair of local Governing Body Kate Taylor	Tel: 01684 593241 Email: chair@hanleycastlehs.org.uk
Safeguarding Governor Carol Ibbs	Tel: 01684 310246 Email: head@wellandprimary.worcs.sch.uk
External	

Children's Services Family Front Door (FFD)	Tel: 01905 822666 Email: childrensteam@worcestershires.gov.uk
Emergency Duty Team (EDT) – out of office hours	Tel: 01905 768020
Community Social Work Team	Tel: 01905 846057
Local Authority Designated Officer (LADO) James Hancock & James Borland	Tel: 01905 846221 Email: lado@worcestershires.gov.uk
Education Adviser – Safeguarding: Denise Hannibal	Tel: 01905 844436 Email: dhannibal@worcestershires.gov.uk
Police – Prevent Team: DS Stuart Clark	Tel: 01386 591835 Email: stuart.clark@westmercia.pnn.police.uk
Ofsted	Tel: 0300 123 1231
Childline	Tel: 0800 1111
Women's Aid (24hr. Helpline)	Tel: 0800 980 3331
West Mercia Rape and Sexual Abuse Support Centre	Tel: 01905 724514

Training and Independent Support	
Sally Mills Independent Safeguarding Consultant	Tel: 07714 210687 Email: sallymillsconsultant@btinternet.com
Chris and Eve Johnston Create Safer Organisations (CSO)	Tel: 07970 340846 Email: createsafeorgs@btinternet.com
Alison Newman Babcock Prime	Tel: 01905 678176 Email: Alison.Newman2@babcockinternational.com

Community Social Workers

To contact your Community Social Worker for any general queries relating to safeguarding, but any specific advice relating to a child or family **must now go through the Family Front Door**.

Call the Family Front Door on 01905 822666. Press an option which will allow you to speak to someone. You will speak to an Initial Screening and Contact Officer. If you or they believe that the child is at risk of significant harm, you will be directed accordingly, and the following points do not apply.

If you would like advice from a Social Worker, the ISCO will offer you an appointment slot, either that same day or at a later date which suits you. The Social Worker that you will speak to will be a community Social Worker.

Team Manager – Rob Kyle	01905 845991 / 07703 097988
Team Support Officer – Kirsty Gardner	01905 846842
Malvern – Alice Gillett (Monday, Tuesday, Wednesday)	01905 845414 / 07771 994866 agillett@worcestershires.gov.uk
Sarah Mulette (Thursdays and Fridays, every other Monday)	07711 388650 smulette@worcestershires.gov.uk