



Thornhill Junior & Infant School

Safeguarding & Child Protection Policy and Procedures 2023-24

Title	Safeguarding and Child Protection Policy and Procedures
Aim	To provide a consistent approach to safeguarding and child protection
Related documents	Safeguarding policy documents
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Signed (Chair of Governors): Paul Spencer

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This Policy is available on the academy website. A copy can be obtained from the school office on request.

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Part 1: Introduction

Safeguarding permeates all aspects of life at Thornhill Junior & Infant School. We recognise that we are an important part of the wider safeguarding system for children, that everyone in school has a safeguarding responsibility and a contribution to make. We aim to provide a positive, stimulating, caring and safe environment which promotes the social, physical, emotional and moral development of each child. We will strive to ensure that all pupils remain safe and free from harm and are committed to playing a full and active part in multi-agency safeguarding processes and responses.

Scope

This policy gives clear direction to staff, volunteers, governors, visitors and parents about our academy and Focus Trust's safeguarding responsibilities and procedures. It also lays-out our expectations and makes clear the ways in which everyone will safeguard and promote the welfare of pupils. This policy and related procedures will be central to staff training and induction.

The academy and Trust's policies and procedures apply at all times where services or activities are provided under the direct management of academy staff. These are reviewed as and when required and at least annually. Should any deficiencies or weaknesses in safeguarding and child protection arrangements become apparent they will be remedied without delay.

Legislative Framework and Guidance

This Policy is consistent with relevant legislation, regulations, statutory and non-statutory guidance, for example (this list is certainly not exhaustive):

- Human Rights Act 1998
- Equality Act 2010
- Children Acts 1989 and 2004;
- Children and Social Work Act 2017;
- Child Care Act 2006;
- Education (Independent Schools Standards) (England) Regulations 2003;
- Working Together to Safeguard Children;
- Keeping Children Safe in Education (2023);
- Statutory Framework for the Early Years Foundation Stage (2021);
- Ofsted: Inspecting Safeguarding in early years, education and skills settings.

Local Arrangements & Procedures

Our approach is informed by and consistent with the safeguarding partnership arrangements, multi-agency models, protocols and procedures in our area:

a) Kirklees Safeguarding Children Partnership

<https://www.kirkleessafeguardingchildren.co.uk/>

b) Multi-agency procedures for Kirklees:

<https://www.kirkleessafeguardingchildren.co.uk/procedures-local-protocols-andguidance/>

Kirklees Early Help Strategy

The Kirklees Early Support Strategy refers to a way of working that means providing interventions early to support and build resilience amongst children, young people and their families – particularly those that may be vulnerable.

<https://www.kirkleessafeguardingchildren.co.uk/safeguarding-2/early-support/>

Definitions

Child - someone who is yet to reach their 18th birthday. (Our commitment to safeguarding and promoting welfare extends to all children, young people and adults who may be vulnerable).

Child Protection - activity undertaken to protect under 18s who are suffering or likely to suffer significant harm.

Safeguarding and Promoting Welfare - Working Together to Safeguard Children provides the following definition:

- protecting children from maltreatment
- preventing impairment of children's health and development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Effective safeguarding demands that all children should be protected from all forms of abuse, violence and harassment. It also relates to a broad range of other issues, policies and procedures (the following list is not exhaustive):

- health and safety
- teaching safeguarding via PSHE / RSE which helps to reduce the risk of abuse, including child-on-child abuse
- safer recruitment including managing premises and external visitors
- staff induction, training and conduct
- managing allegations, low level concerns, escalation and whistle-blowing
- managing complaints
- promoting good attendance (which means addressing issues a round persistent absence, children missing education (CME), elective home education (EHE) and remote learning
- promoting mental health and wellbeing
- promoting positive behaviour
- anti-bullying and cyber-bullying
- online safety

- the acceptable use of ICT, including mobile phones, imagery and photographs
- preventing radicalisation and extremism
- educating, supporting and safeguarding those with additional educational and / or medical needs, including the provision of appropriate intimate care
- educating, supporting and safeguarding those who are or who have previously been looked after, are young carers or are privately fostered
- promoting equality and diversity (which means tackling discrimination and harassment, including sexual harassment).

Safeguarding is at the very forefront of and underpins all aspects of policy development and practice in our school and across the Focus Trust. Therefore, this document must be read, understood and applied in-line with associated policies and procedures.

Central Tenets of Effective Safeguarding

A Safeguarding Ethos and Culture

It could happen here! We recognise that effective safeguarding requires a continuing commitment from trustees, governors, and all staff to ensure that the safety and welfare of children is front-and-centre at all times and that it remains firmly embedded in all of our documentation, practice and relationships. We do more than just what is *required*.

The welfare and best interests of children are always our paramount consideration. We remain vigilant at all times and fully understand that 'it could happen here'. Safeguarding is a whole school undertaking and everyone's responsibility. Our approach reflects and is tailored to our local and national contexts; it takes account of what may happen to children both in school and beyond. Therefore, we:

- implement robust recruitment procedures in respect of all staff, volunteers and visitors to our school, in-line with relevant legislation and guidance. This includes online checks for shortlisted candidates (see FT Policy)
- ensure that day-to-day responsibilities, arrangements, and processes are clear and understood by everyone so that pupils and families, as well as adults in school, know who they can talk to and what to do if they are worried;
- take online safety seriously and do all that is reasonable to limit children's exposure to risk by putting safety mechanisms in place, monitoring usage and educating children and staff about safe and acceptable use;
- promote safety by undertaking, reviewing and updating risk assessments. We also consult and liaise with parents, pupils and partners as part of those processes.

Some of the Practical Things we Do to Keep Children Safe include:

Listening to and Hearing Children

We take positive steps to inform children of their rights to safety and protection and the options available to express and report any worries or concerns. This means developing relationships built on trust which break down or remove barriers and ensuring the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Systems and mechanisms are in place which are well promoted, easily understood and easily accessible for children to confidently report abuse or harassment, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. Anyone can approach any adult in school at any time if they are worried or in difficulty. They will be listened to and heard.

Identifying Risk and Unmet Need and Providing Support as Early as Possible

We do all that we can to safeguard and promote the welfare of all children and young people, e.g. intervening early, creating a safe and calm educational environment, strengthening resilience before problems occur. Well trained staff and our comprehensive pastoral system help us to identify vulnerability, risk and need and enable us work with partners, parents and carers to provide and/or access appropriate help and support. Everyone knows what to look for, how to access early help and their role in its delivery. In some instances, staff may be expected to support the local authority children social care assessment process.

Supporting and Protecting those who May be Especially Vulnerable

We also recognise, however, that some are potentially at greater risk of harm. This is reflected in our policies and practice and our responses are graduated [Assess - Plan - Do - Review] so that we put the right support in place at the right time.

Adopting a Whole-School, Educative and Proactive Approach to Promoting Good Mental Health and Wellbeing¹

We are mindful of our duties under the Equality Act 2010, recognising that some mental health issues will meet the definition of disability. In line with the statutory SEND Code of Practice, we are also alert to how mental health problems can underpin behaviour issues; this means we are well placed to support pupils effectively, working with external support where needed.

Building Resilience

We recognise that high self-esteem, peer support and clear lines of communication with trusted adults help children, especially those at risk of abuse and neglect or who have suffered trauma.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf
<https://www.gov.uk/guidance/teaching-about-mental-wellbeing>
[PHE Whole school approach 2021](#)

Teaching Safeguarding

We maximise opportunities to speak with and to educate children and parents / carers about keeping safe in different contexts, including online and outside school. We include in the curriculum activities and opportunities for PSHE which equip children with the skills and knowledge they need and occasionally use external speakers or organisations to help us to do this².

Working Effectively with Partners

We are clear about our role and responsibilities and those of other agencies and professionals. We work hard to build and maintain positive relationships and partnerships with other agencies, professionals, parents, and carers. We also ensure that our staff are confident and competent in multi-agency environments so that they can contribute effectively and know how to access specialist advice, support, and services as required.

Managing Information

We know that good information management is crucial for effective safeguarding. We understand our powers and responsibilities to share, hold and use information appropriately.

Clear lines of accountability, effective communication and robust record keeping systems enable us to build 'pictures', track progress and work effectively with partners in children's best interests. They also enable us to monitor and evaluate the effectiveness of what we do.

Staff are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care. We manage sensitive information appropriately and our practice complies with legislation, local protocols, and national guidance.³

Wherever possible, we will seek and share information with consent, and respect the wishes of those who do not consent to having their information shared. Governors ensure that everyone is clear about the relevant principles, i.e. the UK GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

Parents have a right to be told about any concerns in respect of their child's welfare and about action that we intend to take or have taken to safeguard and promote it, providing this does not compromise the child's safety, cause undue delay, or might impede an investigation.

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759006/Using_External_Visitors_to_Support_Online_Safety_July_2018.pdf

³ [Safeguarding Info Sharing Advice](#), see also KCSIE 2023, paras. 115-123.

We may share information without consent if, in our judgement, there is a lawful basis to do so. Fears about sharing information will not be allowed to stand in the way of the duty to safeguard and promote the welfare of children.

Well Trained Staff and Governors

Governors ensure that all staff undergo safeguarding and child protection training, as part of their induction. This includes online safety and an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Copies of policies and a copy of Part One (or Annex A, if appropriate) of KCSIE 2023 are provided to **all** staff at induction. All governors also access safeguarding training, including around online safety.

Training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned. Induction training for all new members of staff, including temporary employees or volunteers⁴, includes formal child-protection training which covers:

- KCSIE 2023 Part One, Annex B / A, in-line with roles and responsibilities
- the role, identity and contact details of the DSL and Deputy DSLs
- this Child Protection and related policies, e.g. AUP, online safety, anti-bullying, behaviour, staff code of conduct, whistleblowing,
- the school's safeguarding response to pupils who go missing from education
- an overview of local safeguarding partnership procedures including the continuum of need and early help process.

Copies of core documentation is provided either in paper form or electronically as part of induction / training and staff are required to sign a declaration each year which confirms that they have read and understood them.

All staff also receive regular safeguarding and child protection updates, e.g. via email, e-bulletins, staff meetings, at least annually. Some staff attend multi-agency and more specialised training too, e.g., DSLs, SENDCO, mental health first aid / leads.

Staff receive training around cyber-security and online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring.

Training is refreshed / updated at appropriate intervals in-line with statutory requirements, safeguarding partner recommendations and best practice.

Moreover:

- Induction and staff CPD are reviewed so that we can check that people are receiving meaningful training and know how to apply what they learn in practice

⁴ A proportional, risk-based approach is taken to determine the level of information provided to temporary staff and volunteers.

- Staff training is also integrated and aligned with our whole-school approach and curriculum planning.

Safer Working Practices

Training and induction also include a focus on professional conduct and safer working practice, including the management of complaints, allegations, low-level concerns and whistleblowing. Expectations are high and everyone in our school / trust will work professionally, consistently, and transparently.

Everyone is also clear about the action they should take if:

- concerns arise around an adult's conduct or behaviour (both in and outside work)
- in the event that an allegation is made
- if they have wider concerns about safeguarding practice, ethos, or culture.

Those same expectations and procedures will be applied in respect of peripatetic and centrally managed staff, visitors, volunteers, contractors and Out Of School Settings (OOSS).

Insofar as OOSS, their staff and volunteers are concerned, the school will seek assurances and check that the relevant safeguarding arrangements are in place and that these align with the latest guidance and requirements.

[OOSS guidance 2022](#)

In line with KCSIE 2023, if the school receives an allegation relating to OOSS, it will follow these safeguarding policies and procedures and the LADO will be informed. (para.377).

Those with Key Safeguarding Roles & Responsibilities

Safeguarding is everyone's responsibility and our whole-school approach reflects this. Some people have additional or specific responsibilities for safeguarding:

Safeguarding Governance

Following KCSIE 2023, Part 2, governors:

- governors ensure that the school complies with its duties under legislation and the law at all times. Robust governance provides strategic challenge and ensures that governors test and assure themselves that policies and procedures are in place and effective in that they support the delivery of a robust, whole school approach.
- are aware of their obligations under human rights and equality legislation and recognise the importance of information sharing between practitioners and local agencies, ensuring that we have arrangements in place that set

out clearly the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

While the Designated Safeguarding Lead takes ultimate responsibility for this, governors recognise their responsibility to ensure that the appropriate filtering systems and mechanisms are in place and monitor their effectiveness in line with the relevant standards.

<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>

In so doing, governors consider the number of and age range of children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks. They do this by discussing the standards and any emergent issues with pupils, the DSL and IT staff.

Our Local Governing Body (LGB) holds senior leaders to account, not least because governors are well trained, visible and proactive. The LGB also recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Therefore, it works with the Principal and Designated Safeguarding Lead(s) (DSL) to ensure that staff have opportunities to contribute to and shape safeguarding arrangements in school.

Some governors have additional and specific safeguarding responsibilities:

Chair of Governors

Mr Paul Spencer

The Chair of Governors will liaise with the local authority's designated officer (sometimes called LADO) and Focus Trust's CEO in the event of an allegation against the Principal.

Nominated Safeguarding Governor (NSG)

Mr Andrew Chadwick

The NSG acts as a conduit between the DSL, the LGB and Focus Trust on safeguarding matters. The Principal and Designated Safeguarding Lead meet with and provide regular updates to the Nominated Safeguarding Governor (NSG) every half-term (and a comprehensive report to the LGB at least annually).

Discussions are recorded and any agreed and / or remedial action(s) documented and followed-through, formally and without delay. Structure is provided for Nominated Governors and DSLs via the Focus Trust [annual] Safeguarding Planner which is updated each year. They are also active participants in the Trust's annual [external] safeguarding reviews and audit returns for safeguarding partners.

Designated Safeguarding Leads (DSLs)

Our DSL is:

Jen Rylance

Our Deputy DSLs are:

Mark Horsfall

Jayde Weir

Callum Ivel

Claire Hale

Gemma Padgett (EYFS)

The role and responsibilities of our DSL and Deputy DSLs are described in **KSCIE 2023, Part 2 and Annex C**. Briefly - and this list is certainly not exhaustive - this includes:

- Taking **lead** responsibility for safeguarding and child protection (including online safety)
- Promoting and embedding a culture of listening to children, taking account of their wishes and feelings, and high aspiration for children who might be especially vulnerable (including online and also in respect of their educational outcomes)
- Managing referrals and leading the school's safeguarding response, including at multi-agency level
- Overseeing and managing safeguarding record keeping and information sharing
- Steering, supporting and advising staff
- Acting as a key safeguarding conduit for the Principal and Governors.

Governors ensure that they have the status, training, time, funding, resources and support they need to discharge their responsibilities.

All DSLs/DDSLs have access to supervision sessions. These are planned regularly as part of SLT meetings and can also be in response to concerns raised. Separate supervision sessions are organised on a half termly basis for staff in Foundation Stage (EYFS).

Our DSL takes ultimate and lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place). On a day-to-day basis safeguarding activities may be delegated to a Deputy Designated Safeguarding Lead (DDSL) but final lead responsibility remains with the DSL. This is explicit in their job description.

Training

The DSL / DDSLs are all senior members of staff who are trained to the same standard, at least every two years. They also attend appropriate refresher training.

Knowledge

The DSL / DDSLs all understand their role and responsibilities, can manage referrals, and know how to identify, understand and respond to:

- specific needs that increase vulnerability
- the unique risks associated with online safety (and have the relevant knowledge and up to date capability required to keep children safe whilst they are online)
- specific harms that can put children at risk.

They are also alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers (S.12 Children Act 1989) and recognise the additional risks that looked after, previously looked after and children with special educational needs and disabilities (SEND) face online, e.g. from online bullying, grooming and radicalisation and have the capability to support these children to stay safe online.

The Point of Contact in School and A Source of Advice and Support

We recognise that the Designated Safeguarding Lead (DSL) (and their Deputies (DDSLs)) are most likely to have a complete safeguarding picture in school. Wherever possible, staff will **always** notify [verbally and / or via CPOMS] and, where necessary, speak to the DSL (or DDSL in their absence) if they have a concern about a child's welfare, however 'minor' this might seem. This will happen as soon as possible and always that same [school] day. During term time, the DSL and/or a DDSL will always be available (during school hours) for staff in the academy to discuss any safeguarding concerns with.

At least half-termly meetings between DSLs take place within school to discuss casework. Cases are monitored and regularly tracked to ensure that all possible measures have been explored and endeavoured to be met.

Multi-Agency Working

DSLs and DDSLs are clear about multi-agency processes and procedures, particularly in respect of local authority children's services, e.g. they have a working knowledge of:

- the assessment process for providing early help and statutory intervention, including local criteria for action and referral arrangements
- how local authorities conduct a child protection case conference and a child protection review conference. Our DSL and DDSLs will attend and contribute effectively⁵. Reports will be provided in advance of such meetings, in-line with and, where applicable, using locally agreed templates and protocols.

Managing and Sharing Information

The DSL and DDSLs understand the importance of information sharing⁶, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners.

⁵ The Principal may also attend, as required. Any school staff who are also required to attend or contribute will be provided with appropriate support by the DSL.

⁶ <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

The DSL will ensure that we:

- maintain fit-for-purpose safeguarding records; centrally, securely and in-line with legislation and guidance. This information will only be accessed on a need-to-know basis
- document all concerns and reports (including a clear and comprehensive summary of them), discussions, referrals, decisions made, the reasons for those decisions, how any issues were followed-up and resolved and the overall outcome on the CPOMs system
- liaise and work closely with those leading on the promotion of educational outcomes of children who have or have had a social worker to provide strategic oversight around outcomes of these children⁷.
- transfer relevant safeguarding and child protection information when children leave our school. This will happen as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. (This information will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt will be obtained)
- consider whether to share any information with the new school in advance of a child leaving. (For example, information that would allow them to have appropriate support in place when the child arrives).

⁷ [VSH extended role vulnerable children June 2022](#)

This also means sharing appropriate information with staff, on a need to know basis, in order to ensure that they know who these children are, understand their academic progress and attainment, can identify the challenges that they might face and the additional academic support and adjustments that could be made to best support them.

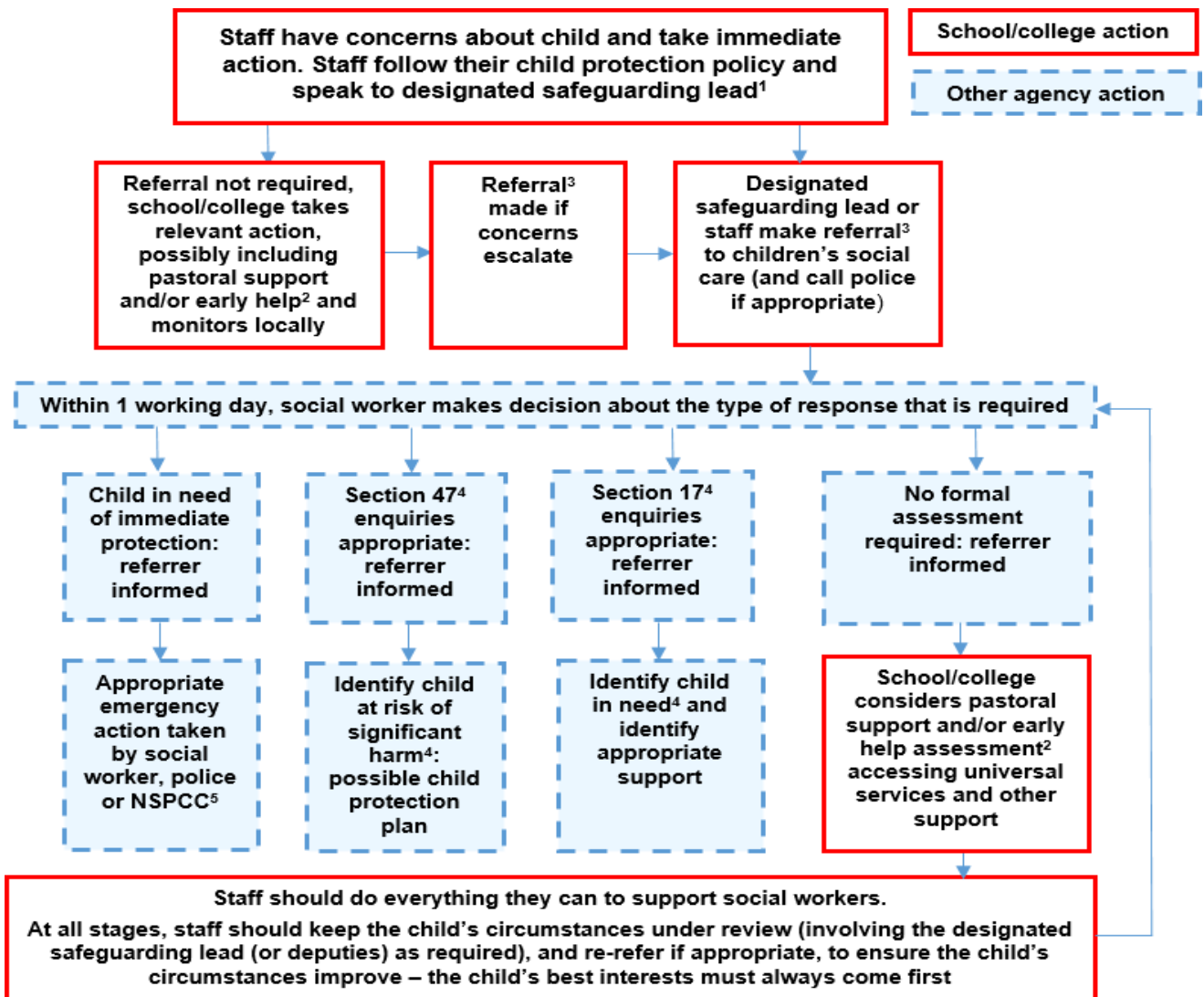
Part 2: What to Do If You Are Worried

Useful Contacts	
Name / Role / Service	Contact Information
In Our School	
Chair of Governors	Paul Spencer p.spencer@focus-trust.co.uk
Nominated Safeguarding Governor	Andrew Chadwick a.chadwick@focus-trust.co.uk
Designated Safeguarding Lead (DSL)	Jen Rylance j.rylance@focus-trust.co.uk
Deputy DSLs	Mark Horsfall m.horsfall@focus-trust.co.uk Jayde Weir jayde.weir@focus-trust.co.uk Gemma Padgett g.padgett@focus-trust.co.uk Callum Ivel c.ivel@focus-trust.co.uk Claire Hale c.hale@focus-trust.co.uk
Prevent Lead (Single Point of Contact / SPOC)	Jen Rylance j.rylance@focus-trust.co.uk
Designated LAC Teacher	Gemma Padgett g.padgett@focus-trust.co.uk
SENDCO	Gemma Padgett g.padgett@focus-trust.co.uk
Mental Health Lead	Gemma Padgett g.padgett@focus-trust.co.uk
Attendance Lead	Jayde Weir jayde.weir@focus-trust.co.uk
ICT / Online Safety Lead	Mark Horsfall m.horsfall@focus-trust.co.uk
PSHE / RSE Lead	Tom Beaumont t.beaumont@focus-trust.co.uk
Early Years Leader	Gemma Padgett g.padgett@focus-trust.co.uk
DSL covering before / after school provision	Jen Rylance j.rylance@focus-trust.co.uk
OTHER	
Focus Trust	
Helen Rowland (CEO)	07799 629 465
Human Resources / Working with Schools	0161 707 1520
Corporate Governance Lead Claire Chidzey-Carn	07785 349 516
OTHER	

Local Authority / Multi-Agency	
Schools Safeguarding Advice	Michelle Stephenson and Maxine Wood 01484 221919 schoolsafeguardingofficer@kirklees.gov.uk
Early Help / Assessment	01484 456823 earlysupportmultiagencypanel@kirklees.gov.uk
Children Services Advice	01484 414960 DutyAdvice.Admin@kirklees.gov.uk
Children's Services Referrals	01484 456848 01484 414960
Police Public / Family Protection Unit	01924 335073
LADO	01484 221126 LADO.cases@kirklees.gov.uk
Channel Programme / Prevent	Kirklees Prevent Hub 01924 483747 prevent@kirklees.gov.uk
Children Missing Education	Education Safeguarding Education.safeguardingservice@kirklees.gov.uk 01484 221919
Elective Home Education	01484 221919 EHETeam@kirklees.gov.uk
Virtual School Head	Janet Tolley 01484 225180 Kirklees.virtualschool@kirklees.co.uk
Young Carers	01484 426100 kirkleesyongcarers@barnardos.org.uk
Private Fostering	01484 414960
Housing and Homelessness	01484 221350 24 hrs: 01484 414933 housing.solutions@kirklees.gov.uk
Other	
PCSO linked to School	Julia Stelfox PCSO 223 Dewsbury NPT Team 1 07719418491
Child Sexual Exploitation	01484 414960
CAMHS	0300 304 5555 https://www.thrivingkirklees.org.uk/

National	
See also Annex B of KCSIE 2023	
Concerns About People / Families	
National Domestic Abuse Helpline (24hrs)	0808 2000 247
Help at Hand (Children's Commissioner / LAC)	0800 528 0731 E: help.team@childrenscommissioner.gov.uk
Counter Extremism Helpline	020 7340 7264 (Mon-Fri, 9am-6pm excl bank holidays) E: counter.extremism@education.gov.uk
Anti Terrorism Hotline	0800 789 321
ACT Early (counter terrorism support line)	0800 011 3764
CEOP NCA Safety Centre	https://www.ceop.police.uk/Safety-Centre/
Shelter emergency helpline	0808 800 4444
NSPCC FGM Helpline	0800 028 2550 E: fgmhelp@nspcc.org.uk
Forced Marriage Unit (FMU)	020 7008 0151 E: fmu@fco.gov.uk
Modern Slavery Helpline	08000 121 700
Trafficked Children Helpline	0808 800 5000 E: help@nspcc.org.uk
Karma Nirvana	https://karmanirvana.org.uk/
Afruca	https://afruca.org/
SENDIASS	SENDIASS website
Victim Support	0808 16 89 111
Stop It Now Helpline (Child Sexual Abuse)	08081000900
ChildLine	080011 11
UK Safer Internet Centre Professionals Helpline	0344 381 4772 E: helpline@saferinternet.org
Shelter emergency helpline (housing and homelessness)	0808 800 44 44
Runaway Helpline (call or text free)	116 000
MIND	0300 123 3393
The Survivors Trust (national umbrella agency for specialist rape and sexual abuse support organisations for women, men, young people and children)	08088 010818
National Association for People Abused in Childhood (NAPAC)	0808 801 0331
Samaritans	116 123
Concerns About Culture / Whistle blowing	
Public Concern At Work (national charity, free whistle-blowing support)	020 7404 6609 E: helpline@pcaw.co.uk
NSPCC Whistle-blowing helpline	0800 028 0285 E: help@nspcc.org.uk
Ofsted	0300 123 3155 E: whistleblowing@ofsted.gov.uk

Concerns About a Child or Children



¹ In cases which also involve a low-level concern or an allegation of abuse against a staff member, refer to this policy and KCSIE 2023 Part 4.

² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged.

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

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

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

Effective Safeguarding: Things to be mindful of

It is important for children to receive the right help at the right time. The following guidance applies equally to current, recent and non-recent / 'historical' abuse or allegations, whether these have been investigated previously or not. The broad rules of thumb are:

See also Part 3 of this Policy - what to look out for

- **BE CLEAR ABOUT YOUR SAFEGUARDING ROLE AND RESPONSIBILITIES** - safeguarding is everyone's responsibility! Doing nothing is never an option but don't try and sort things out yourself. Seek timely and appropriate advice and support.
- **FIND TIME & BUILD TRUST** - convey to children that you have time and are a source of help and support who will listen, take them seriously, support and protect them.
- **BE PROFESSIONALLY CURIOUS** - always remember that 'it could happen here' and that it may be already, even though you are not being told that it is. Be prepared to test your assumptions and look beyond the 'obvious'.
- **REASSURE, LISTEN AND HEAR** - talking about abuse can be scary and the barriers are huge for many children. Reassure children who want to talk that they will be given a voice, listened to, and heard without being judged. They are not to blame, creating problems or being a nuisance. The law is there to protect not criminalise those who have been hurt or harmed.
- **REPORT** - if in doubt report it! Act on any 'niggles', low-level concerns, or potential indicators - physical, emotional or behavioural - by bringing them to the attention of the DSL without delay. Any and all potential safeguarding issues must be brought to the attention of the Designated Safeguarding Lead (DSL) or Deputy DSL without delay and always that same day.
- **RECORD** - you are personally and professionally responsible for recording in an appropriate, timely way. If you're not 100% sure, jot down the facts - who, what, where, when - and speak to a DSL without delay. They will give you some steer and support.
- **RESPECT CONFIDENTIALITY** - seek and respect wishes, feelings should be sought and respected wherever possible. Without making false promises, respect confidentiality and manage sensitive information professionally.
- **FOLLOW THINGS UP** - having reported an issue or concern, if you want or think you need feedback, and none has been forthcoming speak to the DSL or Deputy DSL. They should reassure you and make a judgement about what you 'need to know.'

Designated Safeguarding Lead (DSL): Jen Rylance

Deputy DSL(s): Mark Horsfall, Jayde Weir, Gemma Padgett, Callum Ivel and Claire Hale

Chair of Governors: Paul Spencer

Responding to a Report of Abuse

Remember that your initial response is incredibly important!

- ✓ Stay calm & focus on them
- ✓ Check to see if anyone is in danger now
- ✓ Be honest about confidentiality but reassure them that you will only share on a 'need to know' basis
- ✓ Reassure and help them to open up, e.g. the law is there to protect not criminalise them
- ✓ Look interested - keep body language open & respond to theirs
- ✓ Listen at their pace – slow things down and respect pauses / silence
- ✓ Use minimal prompts **TED (tell, explain, describe)**; tell me what happened ...
- ✓ Reflect back what they said to check / confirm your understanding
- ✓ Use their language to show it's their story/experience

Things to avoid

- ⊗ Investigating or interrogating
- ⊗ Promising confidentiality or to keep 'secrets'
- ⊗ Rushing or interrupting
- ⊗ Displaying shock or anger
- ⊗ Leading or multiple questions
- ⊗ Getting embroiled in why
- ⊗ Opinions about what may or may not have happened
- ⊗ Telling people to go and tell or repeat their account to someone else

Make a Record As Soon As Possible

- ☺ Stick to the FACTS as you understand them - who? what? where? when?
- ☺ Use their words and phrases
- ☺ Record what led up to the conversation, where it took place and who was present
- ☺ Make a note of any questions you needed to ask or prompts you used
- ☺ Demeanour and gestures can be really important to record, as can words or phrases that are repeated - try and describe these accurately
- ☺ Differentiate between a fact and an interpretation or opinion
- ☺ Record electronically / in ink, sign and date

Giving SEND Children a 'Voice'⁸

Staff should be sensitive to what might be very subtle indicators of abuse and neglect, especially where children have multiple disabilities⁹.

Research and national guidance make clear the fact that for some children it is not yet possible to proscribe techniques for communicating about possible abusive experiences in ways which are reliable and evidentially safe. We should be mindful of the following when seeking to give these young people a 'voice':

- If possible, involve someone that knows the young person well, who can help communicate with them and who has some insight regarding their level of understanding.
- Environments matter. Unfamiliar, noisy, or busy places create added distractions and/or anxiety.
- More time may be needed for any prompts, questions, or information to be processed.
- Language and symbols need to be as clear and specific as possible. Questions or prompts shouldn't be re-phrased any questions you may need to ask. If necessary, repeat them using the same language and in the same way.
- If you have the knowledge and experience to do so, reinforce what you are saying with visual supports, whether PECS (Picture Exchange Communication System), symbols, pictures or writing, communication passports, etc. or other tools that child uses to communicate.

Things which must ALWAYS be Reported to the DSL / Deputy DSL

- Any concerns that a child may be receiving inadequate care, suffering or likely to suffer any form of abuse or neglect.
- Changes in presentation or behaviour, including any which give rise to worries about trauma, mental health, and wellbeing.
- Incidences or reports of harmful or sexual behaviour, violence, or harassment, whether directed towards self or others, online or face-to-face, in school or outside, recent, or historical.
- Any hint at or report disclosure of abuse or neglect, by a child or anyone else - this includes reports relating to online activity, peers, family members, staff members, volunteers, governors, or anyone else.
- Concerns, niggles or nagging doubts, however trivial they may seem at face value, about an adult's conduct or behaviour around or towards a child or children, e.g. inappropriate behaviour (including online or via technology), comments, excessive one-to-one attention beyond the usual requirements of someone's role and responsibilities, things that don't align with our professional standards or the staff code of conduct.

⁸ [SENDIASS website](#) See also Part 5 for more information on safeguarding SEND and LAC

⁹ [NSPCC safeguarding SEND guidance 2022](#)

Staff will share their concerns with the Designated Safeguarding Lead (or Deputy DSL) in the first instance. That must happen ASAP and always that same day.

All concerns are reported and logged on CPOMS, school's electronic reporting system. Entries are purely factual and without opinion or bias. Alerts are sent to all relevant members of staff to inform them of the concern, which, alongside feedback, is on a strictly need-to-know basis. Within the entry, there will be clear actions for named members of staff to complete. Each entry is then updated with a chronology of the action taken following the reported concern before the case is either escalated further or closed. All staff members working within the academy have login details to report concerns as well as be notified should it be appropriate. The DSL, DDSLs and Pastoral Lead have elevated access, using a secure key. Any adult working within school, without access to CPOMS, i.e., a volunteer, is notified of safeguarding procedures during induction and asked to inform class teacher/DSL of any specific concerns they have.

All staff receive training on an annual basis on how to use CPOMS, with regular refresher sessions throughout the year. All concerns are logged on CPOMS, with staff trained on how to record an 'incident' appropriately.

What the Designated Safeguarding Lead (or Deputy DSL) will do

- Make sure you're okay.
- Check to ensure that any immediate risk and safety issues are / have been addressed.
- Where necessary and without investigating, gather any basic, factual information by speaking to those involved in order to clarify.
- Seek appropriate and timely advice, including legal or specialist advice where necessary.
- Make any onward referral(s) and follow them up in order to ensure that what was agreed was done.
- Ensure that CPOMS is updated and that a sufficiently comprehensive record has been made.
- Feedback on a need-to-know basis.
- Reflect on and disseminate any learning across the staff team and feedback to partners.

What if You Are Dissatisfied with the DSL's Response?

In the highly unlikely event that you don't feel listened to, your concern doesn't appear to have been taken seriously or nothing changes, it is your responsibility to follow this up by:

- Going back the DSL and making clear why you're unhappy.
- Talk to a Deputy DSL about your concern.
- Raise your concern with the Principal.
- Contact the CEO / Focus Trust.
- Contact an external agency. Remember, anyone can make a referral.

See contacts on page 13-14 of this policy. See also Whistle-Blowing.

What if you Receive No Feedback after having Reported a Concern?

Having passed on their information - verbally or via CPOMS - if staff want or think they need feedback or an update, they should go back and speak to the DSL or a DDSL. Information will be shared with staff on a 'need-to-know basis'.

What If DSLs are Dissatisfied with the Response from Another Agency or Professional?

Professional disagreements do sometimes arise around safeguarding and child protection issues at multi-agency level. If this happens, the DSL will seek further advice, request re-consideration and / or, where necessary, escalate and challenge other agencies and professionals.

This will be carried out in-line with multi-agency protocols and procedures and carefully documented on CPOMS.

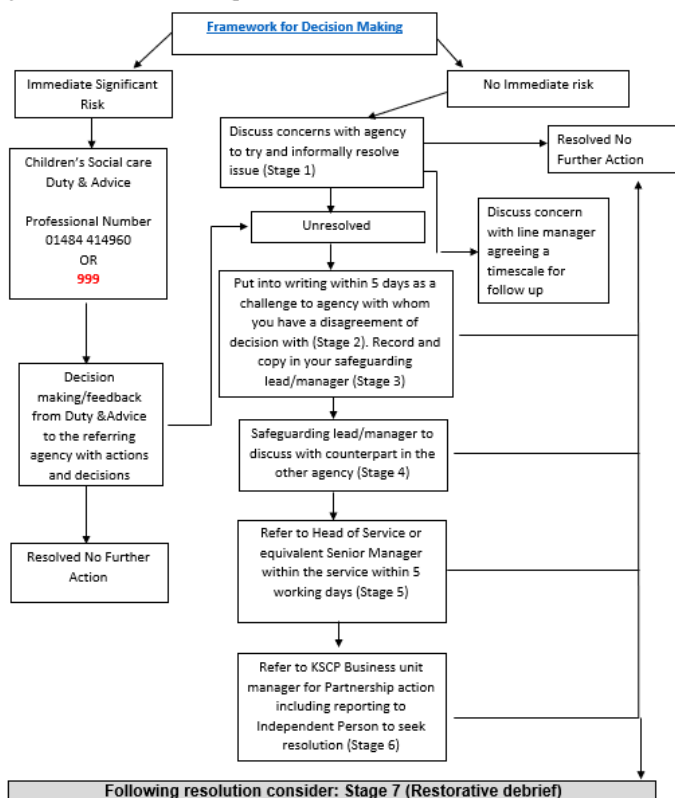
See link below for Kirklees' escalation process:

<https://www.kirkleessafeguardingchildren.co.uk/escalation-process/>

Appendix 1

Kirklees Safeguarding Children Partnership

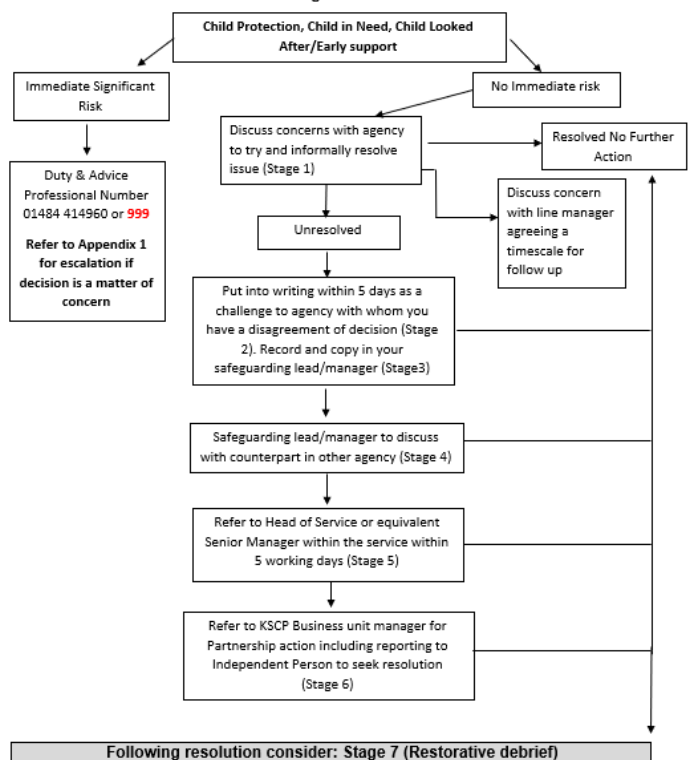
Escalation framework at point of referral: Professional disagreement/escalation process for ANY child residing in Kirklees



Appendix 2

Escalation framework for current Children's Services cases:

Professional disagreement/escalation process for cases involving ANY child residing in Kirklees



In extremis, additional advice and support can and should be sought from Focus Trust's CEO / Safeguarding Consultant.

Concerns About Adults

Managing Allegations, Low-Level Concerns & Whistleblowing

Principles

Any and all allegations and low-level concerns will be managed in line with KCSIE 2023, Part 4 and associated Focus Trust policies, e.g. Low-Level Concerns, Managing Allegations, Staff Code of Conduct, Acceptable Use. When dealing with allegations, we will:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently, and
- provide effective protection for the child and support the person subject to the allegation.

Employers have a duty of care to employees and the Focus Trust will ensure that effective support is provided for anyone facing an allegation. Suspension is not an automatic response to an allegation. Non-recent allegations will be reported and managed in the same, robust way.

Where Focus Trust is Not the Employer

Where supply staff and contractors are concerned, individuals are still under the supervision, direction, and control of the LGB, and we will ensure that any allegations are reported and managed in line with the statutory guidance, Focus Trust and local policies and procedures.

Other agencies, including OOSS, their staff and volunteers, should be aware of this. We will liaise with HR Manager during any allegations management process and take account of their policies, procedures and duties, i.e. to refer to the DBS in their capacities as personnel suppliers.

(i) Allegations that may meet the harm threshold¹⁰

What is an Allegation?

This guidance should be followed where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- *behaved in a way that has harmed a child, or may have harmed a child and/or*
- *possibly committed a criminal offence against or related to a child, and/or*
- *behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or*

¹⁰ The harm test is explained in the Disclosure and Barring service [Guidance: Making barring referrals to the DBS](#), and [Section 31\(9\) of the Children Act 1989 as amended by the Adoption and Children Act 2002](#)

- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as **transferable risk**. Where appropriate an assessment of transferable risk to children with whom the person works will be undertaken. If in doubt, advice will be sought from the local authority designated officer (LADO). This includes allegations pertaining to OOSS (KCSIE 2023, para. 377).

Responding to Allegations

There are two aspects to consider when an allegation is made:

1. Looking after the welfare of the child.
2. Investigating and supporting the person subject to the allegation

Staff Receiving an Allegation or Report should:

Anyone receiving a report or allegation will:

- Listen carefully and non-judgementally to what is being reported.
- Make clear the fact that they are obliged to report the matter to the DSL / Principal or Chair of Governors.
- Ensure that they have a basic grasp of the fact as reported to them, i.e. who, what, where, when.
- Report the matter without delay.

They must not:

- offer opinions about who may or may not be involved or what may or may not have happened.
- Discuss this with anyone other than the person who will be the case manager, i.e. DSL /Principal / Chair of Governors.

The Case Manager

This will be the Principal / DSL or, where an allegation is made against the Principal, the Chair of Governors / DSL. These personnel may be directly involved in the management process and understand the local authority arrangements for managing allegations, including what information the LADO will require when an allegation is made. (LADO contact details can be found on page 12).

Prior to liaising with the LADO, the *case manager* will conduct basic enquiries in line with local procedures to establish the facts and to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

For example:

- Did the individual, or could the individual have come into contact with the child?
- Are there any witnesses?
- Was there any CCTV footage?

They may also seek advice from HR / Working with Schools.

The case manager's discussion with the LADO should focus on the **nature, content and context** of the allegation. A course of action and next steps should be agreed.

Record-Keeping, Confidentiality and Information Sharing

Any and all discussions, decisions and reasons for them will be recorded contemporaneously by the case manager. The case manager will be mindful of and ensure adherence to the guidance contained with paras. 390-398 of KCSIE 2023, Part 4.

Suspension, Support, Returns to Work, References, Outcomes, Exit Arrangements and Referrals

Will all be co-ordinated by the case manager in line with KCSIE 2023, Part 4, pages, 89-98. Steer and support will be sought from HR / Working with Schools, LADO and, where relevant, external / investigative agencies.

(ii) Concerns and or allegations that do not meet the harm threshold, aka Low-Level Concerns¹¹

We will adhere to the Focus Trust Low-Level Concerns Policy and KCSIE 2023, Part 4.

Prevention / Culture

We promote an open and transparent culture which enables us to identify inappropriate, problematic, or concerning behaviour early. We ensure that every adult working in our school or on behalf of the trust is clear about and acts within professional boundaries, in accordance with our ethos and values. This helps to minimise the risk of abuse.

What is a 'Low-Level Concern'

The term does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or humiliating pupils.

¹¹ Aka 'low level concerns' as defined in [KCSIE 2023, Part Four](#)

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

How Might they Arise?

Low-level concerns may arise in several ways and from a number of sources, e.g.

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside of the organisation.
- As a result of vetting checks undertaken.

Responding to a Low-Level Concern

All concerns about any adults working in or on behalf of the school or trust are dealt with promptly and appropriately, i.e. they are always:

- Shared responsibly with the right person.
- Recorded and dealt with appropriately.
- Reflected upon to see whether we need to improve or change anything.

Who a low-level concern is reported to will depend on the nature of it, but the Principal will always be the ultimate decision maker on these matters.

Anyone who has concerns should discuss it with the DSL / Principal as soon as possible. They should not discuss it with anyone else.

Recording

Where the DSL / Principal is unsure whether the harm threshold may have been met they will seek advice from LADO and HR / Working with schools.

The DSL / Principal will record:

- details of the concern
- the context in which it arose.
- any action taken.
- name of the person who raised the concern¹²

These notes will be kept securely in CPOMS Staff Safe, in line with the DPA 2018 and UKGDPR. Principals will ensure that any records of low-level concerns are brought to the attention of their successor in the event that they are to leave the school. Low-level concerns will not be included in references.

¹² Their wish to remain anonymous will be respected as far as possible.

Learning Lessons

The Principal and DSL will reflect and check for any patterns wider, cultural, procedural, training or practice issues and take the requisite remedial action.

Whistle Blowing

Anyone should feel able to raise concerns about poor or unsafe practice and potential failures in the academy or Trust's safeguarding regimes and know that such concerns will be taken seriously by senior leaders. Appropriate whistle-blowing procedures, which are suitably reflected in staff training and staff behaviour policies, are in place in and across all Focus Trust schools. These provide clear direction and enable any concerns to be raised appropriately.

Focus Trust

Helen Rowland CEO - see contacts on page 12.

Natalie Harris COO - 07867 423 870

Working with Schools (Human Resources) - 0161 7071520

Where someone feels unable to raise an issue in school or with Focus Trust or feels that their genuine concerns are not being addressed, other options are open to them.

Public Concern At Work (national charity offering whistle-blowing advice and support)

T: 020 7404 6609

E: helpline@pcaw.co.uk

NSPCC Whistle-blowing helpline

T: 0800 028 0285

E: help@nspcc.org.uk

Ofsted

T: 0300 123 3155

E: whistleblowing@ofsted.gov.uk

Part 3: Child Abuse and Neglect

Definitions

Working Together to Safeguard Children defines four, overarching categories of child abuse: Physical abuse, Sexual abuse, Emotional abuse and Neglect.¹³ Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others.

The well-being of **all** children in and at our school is supported and our pastoral system ensures that we build relationships and monitor pupil wellbeing on a regular basis. **We remain mindful that 'it could happen here' and to anyone.**

Common Underlying Vulnerabilities

Any child may benefit from early help, but staff should be particularly alert around any child who:

- is disabled or who has additional and / or complex needs.
- may be perceived /described by some as 'challenging'.
- has limited speech, language or capacity to communicate (for whatever reason, e.g. EAL children)
- presents differently for some unknown reason.
- comes to us with very little background information and whose presentation, behaviour, care, circumstances or behaviour create a 'nagging doubt'.
- is absent from education for prolonged periods and/or on repeat occasions - this could be a vital warning sign to a range of safeguarding issues.
- is living in challenging family circumstances, e.g. where there are concerns around substance or alcohol misuse, parental mental health, domestic abuse, where a family member is in custody, there are faith or honour-based issues.
- is struggling with their own mental health.
- is in care or has previously been in care.
- is showing any signs of or is vulnerable to being drawn into gang-related activity, serious violence, 'county lines', child sexual exploitation, modern slavery, radicalisation or extremism.
- goes missing from home or care, especially if this is repeated.
- is attending alternative provision (we retain ultimate safeguarding responsibility here)
- is a young carer.
- is privately fostered.

Staff are trained to understand their responsibility to act in order to protect children and young from various potential sources and types of harm.

Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including:

- sexual, physical and emotional abuse
- neglect
- domestic abuse, including controlling or coercive behaviour
- exploitation by criminal gangs and organised crime groups
- trafficking
- online abuse including cyberbullying, upskirting and sexting
- prejudice-based bullying and abuse
- sexual exploitation
- the influences of extremism leading to radicalisation
- faith and honour-based abuse
- initiation / hazing-type violence
- Fabricated or induced illness

This list is *not* exhaustive.

School staff are well placed to observe any physical, emotional, or behavioural signs which indicate that a child may be suffering or likely to suffer significant harm. All staff receive regular training which ensures they are well placed to pick-up on potential indicators of these different forms and child abuse and neglect. That training is updated in order to ensure that everyone knows about how to identify and respond to new and emergent risks and threats, e.g. online.

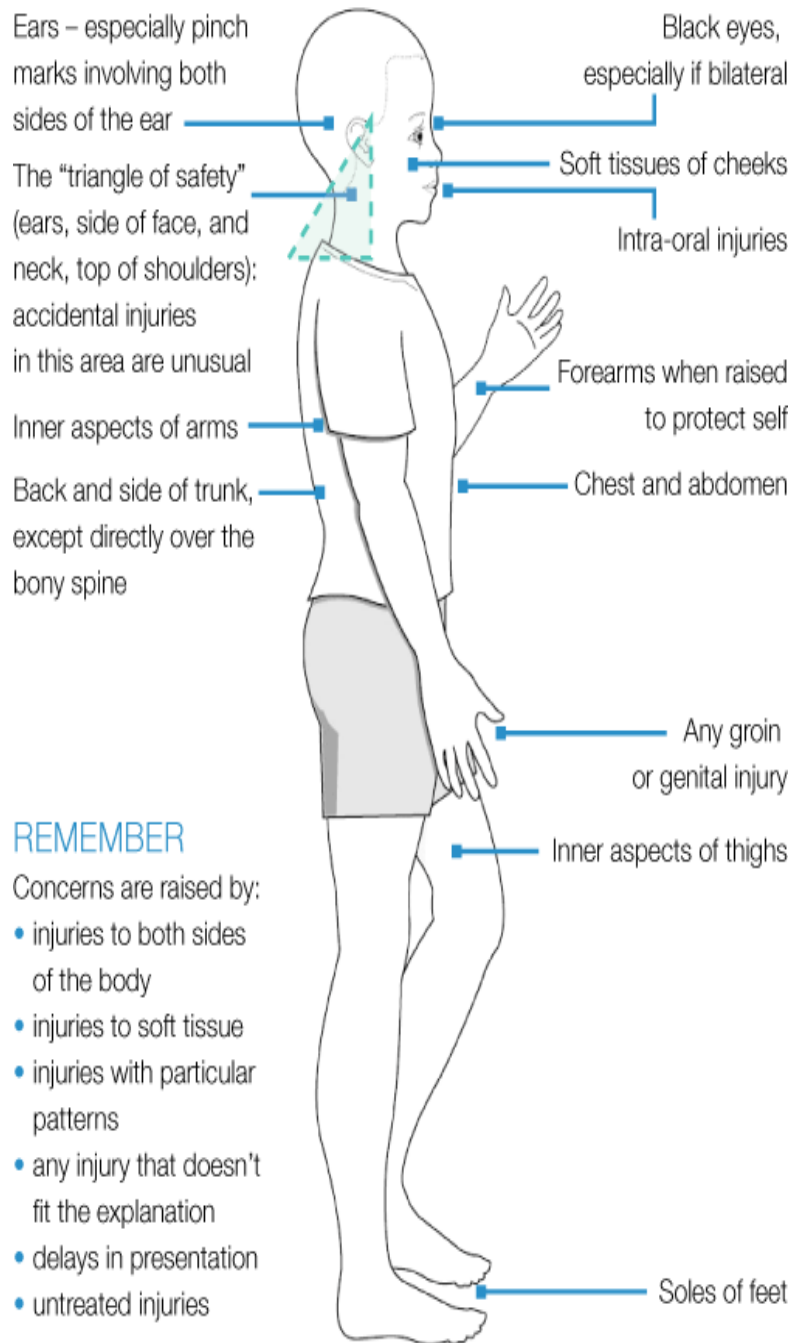
Staff will ALWAYS err on the side of caution, i.e. discuss and share any concerns with the DSL / DDSL without delay. Whatever the form of abuse or neglect, we will always put the needs of children first when determining what action to take.

Potential Indicators¹⁴

There are myriad potential indicators, physical, emotional and / or behavioural. Some are quite generic and apply to more than one form of abuse while others are more contextually specific. Similarly, potential indicators might vary considerably from person to person, depending on their experience(s), circumstances and capacities

¹⁴ <https://learning.nspcc.org.uk/media/1188/definitions-signs-child-abuse.pdf>

Physical Marks and Injuries - things to be mindful of¹⁵



REMEMBER

Concerns are raised by:

- injuries to both sides of the body
- injuries to soft tissue
- injuries with particular patterns
- any injury that doesn't fit the explanation
- delays in presentation
- untreated injuries

¹⁵ Non-medical staff are not qualified to and must not attempt to investigate, prove, disprove or diagnose abuse. If you're worried speak to a DSL without delay.

Marks and Bruising

- ⊗ Marks or bruising or injuries on children who are not independently mobile.
- ⊗ Multiple or clusters of bruises - these are a common feature in abused children, as are those that are uniform in shape, symmetrical or in parallel, e.g. straight lines, on opposite sides
- ⊗ In cases of physical abuse, the head and face are the areas of the body most commonly injured.
- ⊗ Injuries to the lips - the most common recorded abusive injury to the mouth
- ⊗ Bruising on the forearm, face, ears, abdomen, hip, upper arm, back of the leg, hands or feet - may have been sustained when children were trying to defend themselves.
- ⊗ Non accidental injuries (NAIs) may carry the imprint of an implement, cord or hand.
- ⊗ Severe bruising to the scalp, with swelling around the eyes and no skull fracture, may occur if the child has been "scalped" – i.e. had their hair pulled violently.
- ⊗ Bruises or marks in fleshy areas / away from bony prominences, especially to the face, back, abdomen, arms, buttocks, ears and hands.
- ⊗ Petechiae (dots of blood under the skin) around them are less common in accidental injuries.

Burns and Scalds

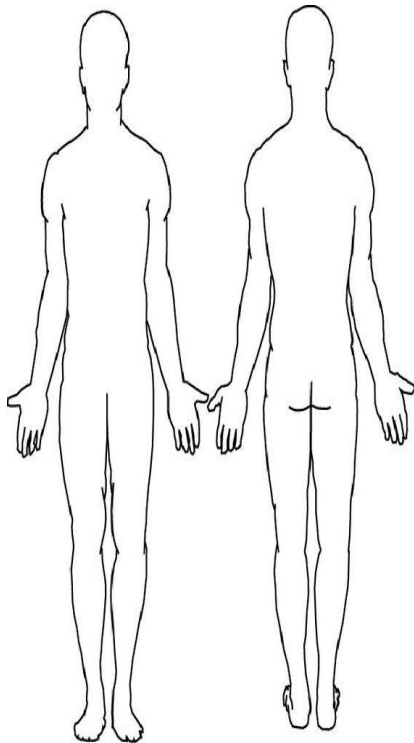
- ⊗ Intentional immersion scalds usually affect the lower limbs (with or without the buttocks or perineum - bit of skin between genitals and anus). They may also affect both arms and/or both legs like a 'glove' or 'sock'. Characteristically, non-accidental injuries might have a clear upper limit to the scalded skin area which is of uniform depth.
- ⊗ Burns can sometimes be deliberately inflicted as part of a cultural belief or traditional remedy, e.g. moxibustion - burning the moxa herb under a glass over the part of the body affected; 'cupping' - causes superficial circular burns, usually on the back - see also pages 29-32 of this policy.

Bites

- ⊗ Where an adult bites a child sufficiently hard to leave a mark, it is an assault. A bite leaves an oval or circular mark, consisting of two symmetrical, opposing, u-shaped arches separated by an open space. The arcs may include puncture wounds, indentations or bruising.

Recording Using Skin / Body Maps

Marks and injuries fade, disappear and change colour or shape at different rates on different people. It is imperative that a fit-for-purpose record is made by the person who notices a mark or injury and that the DSL is notified asap that same day.



- ✓ Record the following in respect of each mark identified
- ✓ Exact site of injury on the body, e.g. upper outer arm/left cheek;
- ✓ Size of injury - in appropriate centimetres or inches;
- ✓ Approximate shape of injury, e.g. round/square or straight line;
- ✓ Colour of injury - if more than one colour, say so;
- ✓ Is the skin broken?
- ✓ Is there any swelling at the site of the injury, or elsewhere?
- ✓ Is there a scab/any blistering/any bleeding?
- ✓ Is the injury clean or is there grit/fluff etc?
- ✓ Is mobility restricted as a result of the injury?
- ✓ Does the site of the injury feel hot / does the child feel hot / in pain?
- ✓ Has the child's body shape changed?
- ✓ Are they holding themselves differently?
- X **Do NOT** remove clothing unless the site of the injury is available because of treatment;
- X **DO NOT** try to explain what you think caused the marks;
- X **Do NOT** take photographs
- X **Never** in pencil and **do not** use correction fluid or any other eraser

Trauma, Mental Health-related and Emotional / Behavioural Indicators

Our staff access training appropriate to their roles and responsibilities, including around attachments, child development, mental health and trauma. We know that 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. Staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education¹⁶.

¹⁶ <https://beaconhouse.org.uk/resources/> UK Trauma Council Resources

These problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. While we are conscious that only appropriately trained professionals should attempt to make a diagnosis, staff remain 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 one¹⁷.

Our SENDCo (Gemma Padgett) undertook the Mental Health Lead Training last academic year (2022-23). Members of teaching and non-teaching staff have also completed Mental Health First Aid training. Staff work closely to support and signpost those who may need access to additional guidance/services.

If staff have a mental health concern about a child that is also a safeguarding concern. Immediate action will be taken in line with this policy and safeguarding procedures, i.e. **any and all concerns around mental health will be reported to the DSL without delay**

Neglect¹⁸ and Faltering Growth

Working Together to Safeguard Children defines child neglect as:
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:

- a. provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- b. protect a child from physical and emotional harm or danger.
- c. ensure adequate supervision (including the use of inadequate care-givers)
- d. ensure access to appropriate medical care or treatment.

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

Neglect continues to be a significant underlying feature in over 50% of serious case reviews which also remind us of the inherent dangers of 'professional dangerousness' which can manifest as or via 'start again syndrome', 'rules of optimism' etc. There may also be a tendency to 'wait and see' and / or to wait for a trigger incident before taking action and these things can be particularly problematic when agencies lack capacity or where personnel come and go on a

¹⁷ [Mental Health and Behaviour in Schools](#) See also KCSIE 2023, Annex B, pp.148-9.

¹⁸ [Neglect and Case Reviews analysis 2022](#)

regular basis, i.e. it becomes harder to see the full picture from the child's perspective.

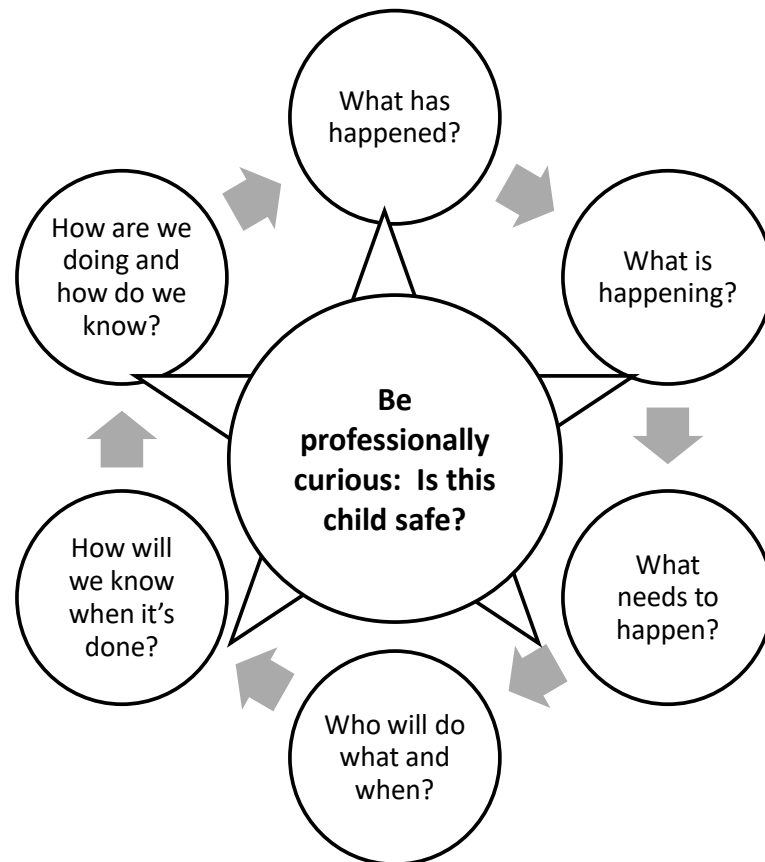
The assessment of neglect can be difficult and time consuming, not least because it can fluctuate both in level and duration. A child's welfare can, for example, improve following input from services or a change in circumstances and review, but then deteriorate once support is removed. It can also be difficult to distinguish between neglect and material poverty. However, care should be taken to balance recognition of the constraints on the parents' or carers' ability to meet their children's needs with an appreciation of how people in similar circumstances have been able to meet those needs¹⁹. All of these 'pitfalls' can deflect us from a focus on children and their lived experiences.

Professional Curiosity and Keeping Children in Focus

Staff recognise their responsibility to remain vigilant and to monitor children who may be at risk of or experiencing neglect closely and holistically, e.g. on the yard, before and after school as well as in the classroom, and are mindful of the need to guard against the inherent dangers of cultural relativism, assuming and / or explaining concerns away, i.e. 'that's just how they are' ... 'what's the point' ...

¹⁹ The term 'faltering growth' (previously referred to as 'failure to thrive') is used in relation to infants and young children whose weight gain occurs more slowly than expected.

Keeping the Child in Focus



DSLs will:

- familiarise themselves with local tools and models for assessing and responding to child neglect.
- meet regularly to discuss progress and ensure that CPOMs chronologies take account of the child / family's whole story.
- be mindful of the need to convey that picture and the child's daily lived experience in referral and other multi-agency processes.
- recognise that no change can be as concerning as deterioration.
- will be well informed and robust when it comes to thresholds, planning and review decisions, questioning, challenging, and escalating as appropriate.

Cultural competence

Staff and DSLs alike will also be mindful of the need for them to remain culturally competent. This is underpinned by the knowledge and interpersonal skills which enable us to understand, appreciate, and work with individuals from cultures other than our own.

It means:

- being open to, accepting, valuing diversity and difference.
- being sensitive and responsive to the beliefs, practices, cultural and linguistic needs of children and families.
- being aware of the impact of our own cultural identity on others.
- consciousness around how cultures interact with each other and the significance and impact of this in practice (for example power imbalances and traditional boundaries within and between cultures)
- developing specialised knowledge and understanding of the history, religions, traditions, values, family systems and languages represented in your community.
- developing an understanding of communities, resources within communities and being able to make appropriate connections with them.
- contributing to the development of practice that reflect understanding of diversity.
- reflecting on our own assumptions and stereotypes associated with any cultural, ethnic, or religious group.

Being culturally competent does not mean shying away from questioning & challenging beliefs or behaviour which are abusive or harmful.

Child Linked to a Belief in Possession by Spirits or Witchcraft ²⁰

Research indicates that the belief in 'spirit possession' or 'witchcraft' is widespread across the world. It is not confined to particular countries, cultures or religions, nor is it confined to new immigrant communities in this country. These beliefs occupy a broad spectrum, and the effects range from harmless to harmful. Belief in spirit possession and witchcraft is not of itself evidence of maltreatment. Although the number of known child abuse cases linked to accusations of 'spirit possession' or 'witchcraft' in Britain is small, it is possible that a significant number of cases go undetected. The nature of the abuse can be particularly disturbing and the impact on the child is substantial and serious.

There are links between 'spirit possession' and 'witchcraft' and exploitation in that belief in magic or witchcraft may be used to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

The term 'spirit possession' means that a force, spirit, god, or demon has entered a child and is controlling him or her resulting in a change in health or behaviour. Sometimes the term 'witch' or 'witchcraft' is used. This is the belief that a child is able to use an evil force or supernatural powers to harm others. There is a range of terminology connected to such beliefs, for example black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah and child sorcerers.

²⁰ [NSPCC faith communities guidance Afruca guidance leaflets](https://safeguarding.network/content/safeguarding-resources/harmful-practices/child-abuse-linked-to-faith-or-belief/)
<https://safeguarding.network/content/safeguarding-resources/harmful-practices/child-abuse-linked-to-faith-or-belief/>

Families, carers and the children involved can hold genuine beliefs that evil forces are at work. Families and children can be deeply worried by the evil that they believe is threatening them. There may also be an element of the adult gaining some gratification through the ritualistic abuse of the child, which may even result in the death of the child.

In cases of 'spirit possession' or 'witchcraft' which involve children, the parent/carer views the child as 'different' and attributes this to the child being 'possessed'. This can lead to attempts to exorcise the child. Perceptions of and around 'difference' can be varied and include disobedience, independence, bedwetting, nightmares or illness. In some cases, there will be no obvious difference and the child will have been targeted because they are perceived to be 'spiritually' different. The attempt to exorcise may involve beating, burning, starvation, cutting/stabbing and/or isolation within the household, all of which obviously constitute abuse.

Potential indicators of abuse linked to belief in spirit possession include:

- a child reporting that they are, or have been, accused of being 'evil', and/or that they are having the 'devil beaten out of them'.
- signs of physical abuse (see pages 25-6)
- children becoming noticeably confused, withdrawn, disorientated or isolated.
- deteriorating personal care
- irregular attendance or child being taken out altogether.
- lack of parental concern or attachment

Obviously, these may also be common features in other kinds of abuse.

Honour Based Abuse (See also KCSIE 2023, Annex B)

Good awareness around honour-based abuse (HBA) is important in safeguarding people of all ages and from an array of communities. It 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.

Regardless of motive, this is abuse and it will 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. In school, any and all concerns will be reported to the DSL without delay.

Staff are mindful of and will apply the 'one chance rule' i.e. we may only have one chance to listen, gather crucial information and, potentially, save a life. Under no circumstances will attempts be made to mediate or discuss HBV related concerns with parents, carers, siblings, community leaders, elders or anyone other than the DSL in the first instance.

DSLs will liaise with children's services, police and other agencies as required. Information will be shared promptly and appropriately, risk(s) assessed, and management and support strategies put in place. 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 for DSLs to be aware of this dynamic and additional risk factors when deciding what action to take.

Female Genital Mutilation (FGM) ²¹

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals from all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of FGM. It can happen anywhere in the world, but most commonly, it is practiced in parts of Africa, Asia, the Middle East and South America.

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.

Breast Ironing / Flattening

Research has identified this as an issue in all ten regions of Cameroon and it has also been reported in Benin, Ivory Coast, Chad, Guinea-Bissau, Kenya, Togo, Zimbabwe and Guinea-Conakry. The United Nations (UN) estimates that it affects 3.8 million women around the world. Girls usually aged between 9 – 15 years and from practising communities are at greatest risk.

The practice uses large stones, a hammer or spatulas that have been heated over hot coals to compress the breast tissue of girls. (Those who derive from richer families may opt to use an elastic belt to press the breasts so as to prevent them from growing).

The mutilation is designed to make teenage girls look less "womanly" and to deter unwanted male attention, pregnancy and rape and is commonly performed by family members, often the mother. Girls are led to believe that it is in their best interests and so often remain silent about it. Research indicates that some fathers may be unaware that the practice is being carried out.

²¹ [FGM Fact Sheet](#). See also [p.14 of this policy for FGM helpline information and KCSIE 2023, pages 154-5](#)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/905125/6-1914-HO-Multi_Agency_Statutory_Guidance_on_FGM_-_MASTER_V7_-_FINAL_July_2020.pdf

Forced Marriage ²²

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Forcing someone to marry 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, (physical, emotional or psychological) threats or any other form of coercion is used to cause a person to enter into a marriage.

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 communities use religion and culture as a way to coerce a person into marriage.

It is important to remember that this happens to boys as well as girls and equally important not to assume that this does not happen to children of primary school age. Schools can play an important role in safeguarding children from forced marriage and things which staff need to look out for and bring to the attention of the DSL include:

- requests extended periods of absence.
- failure to return from another country.
- absence or persistent absence.
- changes in behaviour, attendance, performance, punctuality.
- withdrawal from school with no appropriate EHE in place.
- not being allowed to participate in extra-curricular activities.
- sudden announcement of engagement to a stranger.

Again, these are not necessarily indicators of forced marriage but things that DSLs need to know about so that they can make an informed judgement about what should happen next.

²² [Forced Marriage Resource Pack 2023](https://www.gov.uk/guidance/forced-marriage) <https://www.gov.uk/guidance/forced-marriage>
<https://karmanirvana.org.uk/get-help/get-help-questions/>

PART 4: Contextual Safeguarding & Extra-Familial Harm²³

What do we Mean by 'Contextual Safeguarding'?

Safeguarding policy and practice at Thornhill Junior & Infant School reflect and is tailored to our local context and that of children and partners. This means that what we do and how we do it is oriented around a wide view and understanding of what may happen to children in school and beyond, including online.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse, e.g. child criminal and sexual exploitation, serious violence and gang-related activity. Contextual safeguarding is oriented around and facilitates early intervention and prevention, community-based support and local partnerships alongside effective law enforcement and criminal justice responses.

We set great store by our relationships with pupils and their families. This helps us to pick-up on change(s), recognise and respond to the indicators of potential vulnerability and to provide early support that is effective. Wherever a young person begins to show the signs of exploitation or vulnerability to exploitation, and is therefore at increased risk from serious violence, we will intervene as early as possible to help reduce the risks and increase protective factors. We also remain firmly committed to making the fullest possible contributions to multi-agency planning, information gathering / sharing, risk assessment / management, support and review processes in order to:

- establish whether wider environmental factors are present in a child's life and are a threat to their safety and/or welfare; and
- ensure that interventions focus on addressing these.

Everyone here is aware that harmful incidents and/or behaviours can be associated with factors outside school and that they can occur between children. Therefore, everyone (and especially the DSL and DDSs) will consider whether children are at risk of abuse or exploitation in situations outside their families, including online and within their peer group. Threats and risk can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as 'county lines', trafficking, modern day slavery, child-on-child sexual violence and harassment, online abuse, sexual exploitation and the influences of extremism leading to radicalisation.

Any and all concerns around criminal or sexual exploitation, serious violence and / or gang related activity will be dealt with as safeguarding issues and in line with

²³ See also KCSIE 2023, esp. Annex B [Research In Practice principles](#)
<https://contextualsafeguarding.org.uk/> [Safer Young Lives 2022: talking to young people about staying safe](#)

local safeguarding partnership arrangements, procedures and protocols. Staff will bring them to the attention of the DSL without delay.

Radicalisation and Extremism²⁴

Preventing radicalisation and extremism is an integral part of safeguarding in school. For example, we will be mindful of its potential significance in respect of recruitment and selection, online safety, the use of external providers and speakers, the curriculum and our duty to promote / support children's spiritual, moral, social and cultural development and British values.

**See also KCSIE 2023, Annex B, pp.150-2 for more information and resources
See contacts on pages 13-14 of this policy**

Definitions

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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.

²⁴ See also Incels: <https://safeguarding.network/content/responding-to-the-incel-ideology/>

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.

The Prevent Duty²⁵

The Counter Terrorism and Security Act 2015 places a duty on a number of organisations, including schools, to prevent all radicalisation and extremism. The purpose is to protect children from harm and to ensure that they are taught in a way that is consistent with the law and British values. In order to comply with the Prevent Duty we adopt a tiered approach²⁶ - **see table over the page.**

We acknowledge that the process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. As with any other concern, the risk of harm is raised when young people are vulnerable and is often noticed when children change their behaviour, clothing or attitudes.

There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas. As a broad rule of thumb, children who are more susceptible in the real world are also more vulnerable online. We are also mindful of the fact that extremists often target the vulnerable – including the young – by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

Our Tiered Approach to Prevent

Generally	Specifically	Procedurally
<ul style="list-style-type: none"> A risk /self-assessment and action plan are in place to reduce and manage risk. This reflects our local context, has been signed-off by governors and is reviewed regularly. <u>All</u> staff in school are trained and that they understand the risks affecting children and young people. 	<ul style="list-style-type: none"> Ensuring that DSLs have attended specific [WRAP] training in-line with statutory guidance. This ensures that they are able to provide advice and support to other staff. Strategies and systems in place which enable us to manage access to extremist material i.e. by ensuring appropriate 	<ul style="list-style-type: none"> Clear procedures are in place which enable us to protect and support those identified as being at risk, i.e. working in partnership with local authorities,

²⁵ [Oct 2022 guidance inc self assessment requirements](#)

²⁶ [Revised Prevent Duty guidance](#)

<ul style="list-style-type: none"> • Appropriate systems in place for filtering, monitoring, reporting and responding to inappropriate online searches (including in languages other than English) • Building resilience, e.g. through the curriculum, teaching and learning. Providing a safe environment in which children and young people can discuss and learn about British Values, respect, citizenship etc. 	<p>and proportionate online filtering and monitoring occurs in school, and by having clear processes in place for monitoring behaviour, including online, so that we are able to identify individuals who may be at risk.</p> <ul style="list-style-type: none"> • Relevant checks prohibit extremist speakers and events in school and to ensure that external providers are suitable. 	<p>the police and others in the community, including parents.</p>
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Recent research also tells us that children and young people at risk of radicalisation had similar underlying susceptibilities to those at risk of being groomed into gangs. Staff should be vigilant and mindful about these potential 'overlaps' and transitions.

What research tells us to be mindful of:

Vulnerability	Online	On the Ground
<ul style="list-style-type: none"> • Almost all children and young people referred as at risk of radicalisation are young men. • Commonly identified vulnerabilities include: <ul style="list-style-type: none"> - looking for connection and struggling with social relationships - sense of belonging (i.e. wanting to be needed, seeking a group. Distinct from, but often linked to, social isolation) - low confidence / self esteem - mental health problems - autism (with children and young people being more vulnerable to developing fixations and finding it more difficult to shift their viewpoints) - other learning needs (such as communication and language difficulties, Attention Deficit Hyperactivity Disorder (ADHD), or Obsessive-compulsive Disorder (OCD)) - neglect - past trauma including exposure to domestic abuse 	<ul style="list-style-type: none"> • Particularly associated with radicalisation to Extreme Right-Wing and mixed/unclear ideologies. • Exacerbated where parents have an insufficient understanding of the risks and threats linked to online platforms. • Children being groomed or radicalised through online discussion forums. • Social media platforms or online games acting as introductory spaces. • Online influences became more significant during the COVID-19 pandemic – more time online, increased isolation exacerbated some underlying vulnerabilities. 	<ul style="list-style-type: none"> • Increase in referrals relation to Extreme Right-Wing ideology coincided with international or local events, such as local activity by Extreme Right-Wing political parties, elections and referendums, and local immigration. • Familial influences remained important in relation to Islamist extremist and Extreme Right-Wing ideologies.

Responses

All staff are expected to exercise their judgement in identifying children who might be at risk of radicalisation and respond proportionately. Any concerns about radicalisation or extremism will be treated as a safeguarding issue, i.e. discussed with the DSL, who will make a decision about speaking to parents / carers, the need to seek external advice and, where necessary make ongoing referrals in-line with locally agreed procedures and protocols, e.g. Police, children's services, Channel.

If a Channel programme²⁷ referral is made (with consent), the DSL may be asked to attend a Channel panel to discuss the individual referred to determine whether and what ongoing support is required.

Child Abduction and Community Safety Incidents²⁸

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

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

We recognise that as children get older, they are granted more independence, e.g. they start walking to school on their own.

Our bespoke PSHCE curriculum is organised progressively to educate our children about managing risk in relation to a range of contexts. It is designed to empower them and build their confidence. In addition, we have links with local PCSOs, who visit school regularly to provide practical advice and build the confidence of children in Key Stage Two. We encourage strong community links with the Police to forge positive relationships and clear communication.

Child Criminal Exploitation / CCE / County Lines, Modern Slavery & Trafficking, Gang Activity and Serious Violence, Child Sexual Exploitation²⁹ Potential Overlaps

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

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

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

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to

²⁷ [Channel Guidance](#) [Channel General Awareness](#)

²⁸ www.actionagainstabduction.org www.clevernevergoes.org.

²⁹ [County Lines toolkit](#)

[Dfe screening, searching and confiscation from Sept. 2022](#)

* **DSLs can find guidance on the appropriate adult role / intimate searches here**

exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

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

- the emergence or a pattern of missing episodes (both from home and school), especially where they are subsequently being found in areas away from their home or in accommodation, they have no connection with, e.g. a 'trap house' or hotel room
- unexplained behavioural change / changes in emotional well-being
- unexplained cash, gifts or new possessions
- association with other young people involved in exploitation, gangs
- involvement in knife crime
- misuse of drugs or alcohol
- coming home late
- possession of / access to numerous phones
- unexplained bus / train tickets

We recognise that children who have been exploited will need additional support to help keep them in education and all staff are aware that children being absent or going missing, particularly repeatedly, can act be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse, or risk of forced marriage.

All staff are clear about the school's registration, [non] attendance, first response and CME policies and procedures. We will intervene early and robustly to address any issues around attendance, including persistent absence, in order to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

Attendance and Children who Are Absent from or Missing Education ³⁰

Regardless of their circumstances, children are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. We set great store by good attendance at school, adhere to and comply with legislation and relevant guidance.

Governors monitor attendance and absence carefully and are mindful of the vulnerability of children who are absent from education. We need to know where children are in order to keep them safe and follow-up non-attendance in a timely and robust way, especially where this is repeated.

³⁰ [Dfe attendance guidance May 2022](#) [Working together to improve school attendance 2022](#). See also Part 5 - EHE

At Thornhill Junior & Infant School, we adopt a pro-active and robust approach to promote good attendance and punctuality. For example:

- Whole school approach and everyone's responsibility
- Clear and regular messaging about our [high] expectations
- Supporting pupils and parents to address causes wherever possible and to stop things from *becoming* problematic.
- Planned, supported and tracked transitions into EYFS and to HS
- Robust and compliant maintenance of registers
- Prompt and robust first responses to none attendance, including having more than one contact number for each pupil as this gives us additional options to make contact with a responsible adult when a child does not attend school, is missing education and / or where there is a welfare and/or safeguarding concern
- Conducting home visits where necessary
- Attendance Panels and Plans where attendance is too low.
- Working closely with the LA, e.g. APSOs
- Monitoring, analysing and tracking data so we understand and can respond to patterns and challenges and gauge the impact of our interventions.

We are clear that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

Our response to persistent absence and children missing from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

In line with the DfE's (2022) guidance then, we monitor the attendance of vulnerable pupils particularly closely, e.g. pupils:

- with lower attendance than their peers
- at risk of becoming persistently absent
- persistently absent
- severely absent
- with medical conditions or SEND with poor attendance
- with a social worker
- about whom there are existing safeguarding or welfare concerns

Where we are concerned, we will continue to:

- ensure that we liaise and work effectively with partner agencies.
- notify and refer to them formally, in line with local protocols and procedures, e.g. where any pupil who fails to attend school regularly, or has been absent without the academy's permission for a continuous period of 10 school days or more
- put in place and regularly review risk assessments for individual pupils - see *example over*
- check to ensure the suitability and effectiveness of and attendance at any alternative provision.

Elective Home Education (EHE)

In September 2016, the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. We comply with the guidance³¹.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work together with the local authority and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child.

This is particularly important where a child has SEND, is vulnerable, and/or has a social worker and we will work closely with the local authority to ensure that any assessments and plans are reviewed, in consultation with parents and carers.

We also acknowledge that there is no proven correlation between home education and safeguarding risk.³² Moreover, some parents who educate at home believe that by doing so, they are safeguarding the child from risk in the school system.

However, a child being educated at home is not necessarily being seen on a regular basis by professionals and this logically increases the chances that any parents who set out to use home education to avoid independent oversight may be more successful by doing so. Several Serious Case Reviews have illustrated this in recent years. We will take all necessary steps to safeguard and promote the welfare of any children about whom we have concerns in this context.

Children Attending Alternative Provision³³

We are also mindful of the fact that children accessing alternative provision might, potentially, be especially vulnerable to abuse and exploitation. When a pupil is with an alternative provision provider, we retain responsibility for the

³¹ <https://www.gov.uk/government/publications/elective-home-education>

³² In some serious cases of neglect or abuse in recent years, the child concerned has been home educated but that has not usually been a causative factor and the child has normally been known anyway to the relevant local authority.

³³ [DfE Alternative Provision](#) [Due to be updated]

safeguarding of that pupil, and will always satisfy ourselves that the provider meets the needs of the pupil. To this end, we will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the academy would otherwise perform in respect of our own staff.

We retain overall responsibility for pupils on our roll. Consequently, in-line with KCSIE 2023, we:

- Agree at placement meetings what will happen if a pupil does not attend.
- Ensure that our DSL monitors those children and young people especially closely.
- Communicate on a regular basis with providers in order to gauge and monitor attendance, progress and effectiveness.

DSL and Attendance Lead: Exemplar Risk Assessment and Management Record

Assessment	Detail		
Historical / Chronological Concerns / reason for this RA			
Current / recent concerns / nature of potential risk factors			
Level of risk			
Management	Detail		
Home visit a priority? (Y/N and rationale)			
Date of and notes following home visit(s)			
Referrals / notifications in line with local arrangements and protocols and named point(s) of contact			
How this plan safeguards and promotes the <u>best interests of this child</u>			
Is the provision safe and how do we know			
Is the young person attending consistently and how do we know			
Is the provision effective and how do we know			
Regular check-ins and conversations with children (as well as adults / parents / professionals)			

Exemplar

Child Criminal Exploitation (CCE) inc. County Lines

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

CCE occurs where an individual or group takes advantage of an imbalance

of power to coerce, control, manipulate or deceive a child into any criminal activity. These activities may also involve the commission of the offences of 'slavery, servitude and forced or compulsory labour and 'human trafficking', as defined by the Modern Slavery Act 2015.

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

Children can be targeted and recruited into county lines in a number of locations including any type of schools, educational institution or residential setting. They are also increasingly being targeted and recruited online using social media.

Any criminal exploitation / county lines related concerns are safeguarding issues which must be discussed with the DSL, without delay. Any suspected criminal activity will be reported to the Police. Referrals to the National Referral Mechanism should also be considered by the DSL³⁴.

Gang-related Activity and Serious Violence

Research has shown that children as young as seven are at risk of being drawn into gang activity and we are mindful that this is not necessarily a high school or inner-city issue. Early Intervention Foundation has identified a range of predictors of gang involvement and youth violence in primary school-aged children, as well as protective factors which reduce the likelihood of youth violence and gang involvement.

Therefore, we acknowledge that primary school is a critical setting for supporting children who are at risk of gang involvement, youth violence and other poor outcomes and continue to work effectively within the wider system to fulfil our early intervention / help, safeguarding and child protection responsibilities effectively.

Our staff are aware of the range of risk factors and common underlying vulnerabilities which increase the likelihood of involvement in serious violence, e.g. being male, being frequently absent or permanently excluded from school, having suffered child maltreatment and having been involved in offending, such as theft or robbery. They are also mindful of potential indicators which may signal children are at risk from, or are involved with serious violent crime include, e.g. poor attendance / persistent absence, going missing from home or care, changes in friendships / relationships amongst peers, association with known gang members or older people who seem controlling, use of or carrying weapons, signs of assault, serious or unexplained injuries.

³⁴ Victims of human trafficking who are identified by a 'first responder', including local authorities, can be referred to the NCA via the NRM (National Referral Mechanism) however this is on a voluntary basis and with the adult victim's consent. Children do not need to give their consent to be referred to the NCA. [NRM guidance Eng and Wales 2022](#) See also contacts on pages 13-14 of this policy.

We are also mindful of the importance of transitions from primary to high school and work hard to make these as smooth as possible, not least by ensuring that the right information is forward to the right people at the right time.

Child Sexual Exploitation (CSE)

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

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

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

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

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

[Child sexual exploitation: guide for practitioners](#)

Child-on-Child Abuse, Harmful Sexual Behaviour, Sexual Violence and Sexual Harassment

The term 'child-on-child abuse' refers to a wide range of activities and behaviour. It is most likely to include, but may not be limited to:

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

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as 'sexting' or youth produced sexual imagery (YPSI)) 'Upskirting'³⁵ which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We are also mindful that:

- Intimate partner relationships can be abusive.
- Peer abuse might manifest differently for boys and girls e.g. girls being touched inappropriately or coerced into sexual activity, boys being initiated into gangs - they may also be experiencing difficulties in respect of masculinity, gender roles and sexual identity.
- Such behaviour may also be indicative of a previous or ongoing abusive experience for a perpetrator and / or victim.
- Children who have been the victims of violent crime may be especially vulnerable and may respond to this by abusing younger or 'weaker' children.
- Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers and additional barriers can sometimes exist when recognising abuse in SEND children.
- Children who are lesbian, gay, bi, or trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- Staff can be victims of sexual violence and sexual harassment. For example, they can be victims of so-called 'Upskirting'. This can happen to males as well as females, to adults as well as children and young people and it might occur in situations and places outside school, including online or on public or school transport.

Consent³⁶

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. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

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

³⁵ We adhere to the requirements of The Voyeurism (Offences) Act 2019.

³⁶ [Rape Crisis England & Wales - Sexual consent](#) [Consent for kids video resource](#)

Harmful Sexual Behaviour (HSB)³⁷

Some children and young people may be at increased risk of exposure to, or of developing, unhealthy sexual behaviours. These include children and young people who have a disability, have been abused, or have experienced other disruptions to their development or socialisation. When children display sexual behaviour which increases their vulnerability or causes harm to someone else, **staff have a responsibility to provide support and protection.**

Knowing how to distinguish healthy and harmful sexual behaviour in children helps in both supporting the development of healthy sexuality and in the protection of children from harm or abuse. HSB can occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

SWGFL HSB Resources for Schools

What's healthy and what's not?

Safe and healthy		
<p>Behaviours are:</p> <ul style="list-style-type: none"> displayed between children or young people of similar age or developmental ability reflective of natural curiosity, experimentation, consensual activities and positive choices 	<p>Behaviours are:</p> <ul style="list-style-type: none"> unusual for that particular child or young person of potential concern due to age, or developmental differences of potential concern due to activity type, frequency, duration or context 	<p>Behaviours are:</p> <ul style="list-style-type: none"> Excessive secretive compulsive coercive, degrading or threatening involve significant age, developmental, or power differences of potential concern due to activity type, frequency, duration or context

Many expressions of 'sexual' behaviour may not be primarily sexual in nature. Those that are may themselves be part of healthy development and give no cause for concern.

³⁷ This may also include Technology Assisted HSB (TA-HSB)
<https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour/HSB-Prevention-toolkit-2021>

Factors which can influence such behaviour are known to include:

- sexual excitement or curiosity
- sensory issues;
- lack of sex and relationships information / education
- lack of privacy
- boredom, loneliness, anxiety, confusion or depression
- family/carer conflict
- lack of appropriate models / boundaries
- trauma inc. emotional, physical, sexual abuse and neglect
- communication / sensory difficulties
- attachment / relationship needs / issues
- gender, masculinity and / or identity issues
- copying the behaviour of others / behaviour seen on the internet or TV.

Research suggests that a very significant proportion of child sexual abuse is committed by someone under the age of 18. Sexual behaviour between children is also considered harmful if one of the children is much older – particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them, greater capacity etc.

Research also tells us that children and young people who harm others sexually are more likely to:

- Have poor self-regulation and coping skills.
- Experience social anxiety and a sense of social inadequacy.
- Have less well developed and internalised rules for social behaviour.
- Possess a poorly developed or primitive sense of morality.
- Lack secure and confident attachments to others.
- Exercise limited self-control and act out their emotional experiences through negative or otherwise inappropriate behaviour.
- Have little insight into the feelings and needs of others and, indeed, their own mental states.
- Place their own needs and feelings ahead of the needs and feelings of others.
- Exhibit a poorly defined sense of personal boundaries.
- Have developed strong and not easily corrected cognitive distortions about others, themselves, and the world they share.
- Have deficits in social skills and in social competence overall.

All staff have read the relevant Parts of KCSIE 2023 alongside this policy. DSLs have also read and are familiar with Part Five. The following staff at our school have also completed the very latest Brook Traffic Light training and know how to use the tool:
Jen Rylance & Jayde Weir

That training has been disseminated at whole school level during staff development sessions.

This means that all staff understand that children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate,

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

Child on Child Abuse, Sexual Violence and Sexual Harassment³⁸

Definitions:

Sexual Violence - sexual offences under the Sexual Offences Act 2003

Sexual Harassment - means 'unwanted conduct of a sexual nature' between children. It can occur online and offline, both inside and outside of school and between two or more people. Harassment can violate a child's dignity, make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. It can have a significant, detrimental impact then, including upon educational attainment. Alongside' HSB, these issues exist on a continuum and may overlap:

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected.	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviour.	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	- Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance.	Instrumental violence that is psychologically and/or sexually arousing to the perpetrator
Shared decision-making	- Generally consensual and reciprocal	Consent issues may be unclear.	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking or not able to be freely given by victim.	
		May include levels of compulsivity	May include elements of expressive violence	

Ref: S, Hackett

***It is important to understand and assess overlap, not least the 'line' between harassment and violence and when it may have been crossed.**

³⁸ See also KCSIE 2023, Part 5

Central Tenets of Our Approach

- Our **whole school** approach means that **all relevant and associated policies** and procedures are clear, consistent, up-to-date and embedded, e.g. online safety, promoting positive behaviour; measures to prevent all forms of bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Our culture, policies and procedures seek to minimise the risk of child-on-child abuse. The systems we have in place are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously.
- We adopt a **zero-tolerance** approach. Worrying or unacceptable behaviour is never acceptable and will never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. We recognise that this can lead to a culture of unacceptable behaviours and an unsafe environment for children. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- We comply with statutory guidance on **Relationships and Sex Education**³⁹. In so doing, we seek to put in place the key building blocks of healthy, respectful relationships, focusing on family and friendships, in all contexts, including online. This sits alongside the essential understanding of how to be healthy.
- We are a 'listening school' and seek to empower children by **breaking down barriers and giving them a voice**. We build appropriate, nurturing relationships via which staff act as positive role models at all times and have systems in place via which children can express / report any worries or concerns. These are **well promoted, easily understood and easily accessible**.
- Our aim is to prevent and **minimise the possibility** of abuse although we recognise that even if there are no reported cases of child-on-child abuse, **it may still be taking place**. Children and young people who abuse others are responsible for their behaviour and safeguarding action must include addressing that behaviour and its causes. Responses should be **proportionate** and should **not criminalise children unnecessarily**.
- Children may not find it easy to tell staff about their abuse verbally. Some children may not be able to communicate verbally while others may face **additional barriers**. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a

³⁹ [RSE statutory guidance](#)

direct report.

- **Pre- planning, effective training and policies** also provide us with the foundation for a calm, considered and appropriate response to any reports.
- Governors ensure that the school contributes to **multi-agency working in line with statutory guidance**. Where necessary, we consult with external agencies in order to seek advice, contribute to multi-agency assessment, planning and support and, where necessary, criminal justice and other proceedings.
- We reflect on any issues / incidents and reflect on our response(s) to them, i.e. we constantly evaluate what we do and how we do it to ensure that we remain fit-for-purpose and robust.

Responding to Concerns, Reports and / or Allegations of Child-On-Child Abuse, Sexual Violence or Sexual Harassment

(a) Guidance for Staff

1. Worrying or unacceptable behaviour will never be ignored, accepted or be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'.
2. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told. Abuse that occurs online or outside school or is non recent must not be downplayed and should be treated equally seriously⁴⁰.
3. Someone reporting a concern or making an allegation will never be made to feel rushed, ashamed, responsible, as though they are being difficult or creating a problem. It is essential that victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.
4. Where listening to a report is concerned, everyone will follow the guidance on **page 17** of this policy. An initial 'disclosure' to a trusted adult may only be the first incident reported, rather than representative of a singular incident. (Trauma can also impact memory so children may not be able to recall all details or timeline of abuse).
5. It is also important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.
6. Any and all concerns relating to child-on child abuse - HSB, sexual violence and / or sexual harassment - will be raised with the DSL / DDSL without delay / as soon as practically possible and a fit-for-purpose professional record made.

⁴⁰ See pages 55-56 of this policy for guidance on Technology Assisted CSA and imagery

(b) Guidance for DSL / DDSLs (see table and decision-matrix over the page)

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Any plan to reduce and / or manage risk posed by a child who is alleged to have abused another must also address their needs and staff must be alert to the possibility that a child or young person who has harmed another may also be a victim; as such, they may have significant unmet needs themselves. They may also be suffering, or at risk of suffering, significant harm and be in need of protection. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

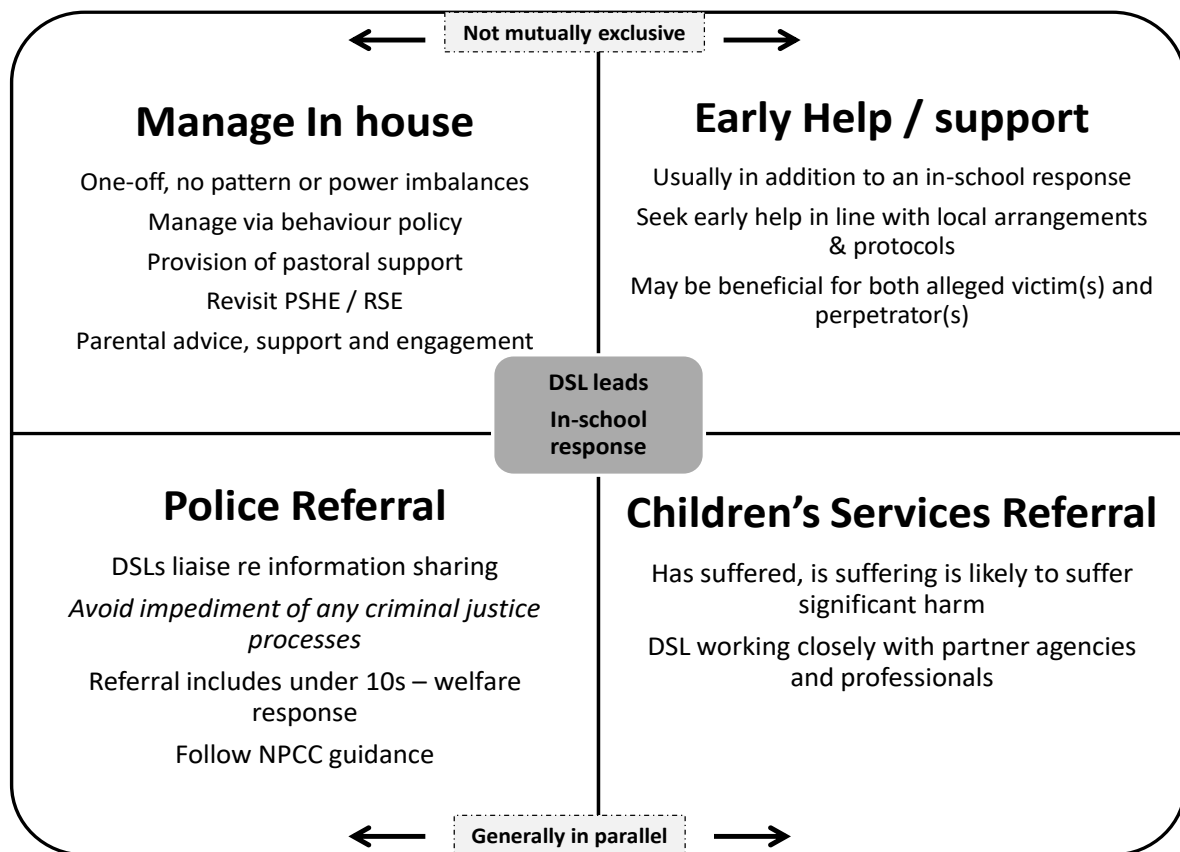
Decisions will be made on a case-by-case basis, with the DSL / DDSL taking a leading role and using their professional judgement, supported by other agencies, as required.

Key Considerations for DSLs

Sense Making ⁴¹	Actions
<ul style="list-style-type: none"> • Nature and seriousness of alleged incident(s) • Ages & developmental stages of those involved. • Any power imbalance(s) / capacity issues • One-off or part of a pattern • Part of an established relationship • Aggravated or experimental 	<ul style="list-style-type: none"> • Violence - <u>immediate</u> risk and needs assessment. • Harassment - risk assessment on case-by-case basis • Immediate steps to protect and support those involved and other children. • Wishes of victim / confidentiality / information sharing • Any potential implications for other CYP inc. siblings • Any wider issues within local area, emergent trends or patterns – work with safeguarding partners • Record • Ongoing review of risk assessments and support plans

⁴¹ Using appropriate 'tools' as required, e.g. [SWGFL HSB Resources for Schools](#)

Response Options for DSL / Deputy DSLs



See contacts on pp. 12-13

Making Decisions which Safeguarding and Support

Risk management and support will be considered immediately, i.e. without delay in **every case**. The basic safeguarding principle is:

- if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority **children's social care**, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the **police**⁴².

In making what can be difficult decisions, DSL / DDSs will always consider:

1. the age and the developmental stage of the victim
2. the nature of the allegations, and
3. the potential risk of further abuse.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Decision makers should also be mindful that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). Overall, decision making, and responses are underpinned by the following principles:

- The needs and wishes of the victim will be our paramount consideration (along with protecting the child). It is important they feel in as much control of the process as is reasonably possible.
- Wherever possible, the victim, if they wish, should be able to continue in their normal routine. (Overall, our priority will be to make the victim's daily experience as normal as possible, so that the school is a safe space for them).

All concerns, discussions, decisions and reasons for them will always be recorded.

Confidentiality and Information Sharing

Staff taking a report should never promise confidentiality and there are no easy or definitive answers where a victim asks school staff not to tell anyone about sexual violence or sexual harassment. If they do not give consent to share information, staff may still lawfully share it if there is another legal basis under the UK GDPR⁴³. DSLs will make these decisions, with appropriate advice. Parents or carers should normally be informed (unless this would put the victim at greater risk).

Ultimately, the DSL / DDSL will need to balance the victim's wishes against their duty to protect the victim and other children. Any decision to make a referral to local authority children's social care and/or a report to the police against the victim's wishes must be handled extremely carefully. The reasons should be explained to the victim and appropriate specialist support offered.

Anonymity

Where a case is progressing through the criminal justice system, the DSL / DDSL will continue to lead on the school's behalf, in consultation with the Principal and will be mindful of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.⁴⁴ This also requires that they consider what staff 'need to know' and how to manage any associated social media issues.

Unsubstantiated, Unfounded or Malicious Reports

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

⁴³ [Safeguarding Practitioners Information Sharing Advice](#) and [NSPCC: Information sharing and confidentiality for practitioners](#).

⁴⁴ [CPS: Safeguarding Children as Victims and Witnesses](#).

Further Information / Resources - *See KCSIE 2023, pages 110-111

Online Safety - A whole school approach

We understand the essentiality of safeguarding children from potentially harmful and inappropriate online material. Online safety is a running and interrelated theme in our policies and procedures; it is also integral to curriculum planning, training and safeguarding per se. As an essential aspect of strategic leadership, the Principal, governors, DSL, ICT and PSHE Leaders liaise and work hard to embed safe practices into the culture of our school⁴⁵.

We do all that we reasonably can to limit children's exposure to risks from the school's IT system. In order to ensure that our approach is proportionate, the LGB consider the age range of pupils, the number of pupils, how often they access the IT system and the proportionality of costs Vs risks.

We comply with cybersecurity standards and ensure that there are appropriate levels of technical security and physical vigilance to safeguard our systems, staff and pupils⁴⁶. We have put in place appropriate systems and software for filtering, monitoring, reporting and responding to inappropriate content / activity⁴⁷. The DSL leads on this and headline data is shared with governors in regular safeguarding reports so that they can monitor effectiveness.

We manage and monitor activity through use of Smoothwall Firewall which features anti-malware protection, HTTPS inspection, anonymous proxy detection & blocking, and intrusion detection & prevention, providing a complete all-in-one protection package.

Smoothwall also provides filtering and monitoring support alerting the Principal to potential risks. The Principal receives instant notifications as well as weekly reports on all activities. Incidents causing concern are responded to as per safeguarding policy and reported on either CPOMS or Staff Safe.

We also understand that technology, the risks and harms related to it and the way that children use it evolve and change rapidly⁴⁸. Therefore, we assess and review our approach to online safety each year.

For example:

- Training for all staff and governors is updated at least annually.
- We carry out an online safety audit each year and any emergent actions are

⁴⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896327/Governors_Guidance_-_English_language_.pdf

⁴⁶ [Cybersecurity standards 2022](#)

⁴⁷ [UK Safer Internet Centre: appropriate filtering and monitoring](#)

⁴⁸ The IWF annual report 2022 notes that 7-10 year olds and boys feature increasingly in online abuse imagery for example [IWF annual report 2022 trends](#)

tracked by senior leaders and governors⁴⁹

We are mindful and take account of the fact that many children have unlimited and unrestricted access to the internet via mobile phone networks and that this might have a range of implications. This is addressed in further detail via online safety education and reflected in our AUP and ICT / Online safety policies which make clear how school will manage these issues.

Our whole school approach empowers us to protect and educate our pupils in their use of technology and establishes mechanisms to identify, intervene and, where necessary, escalate any incidents where concerns arise. This means that:

- Pupils and staff are clear about the importance of cyber-security and what is expected and acceptable behaviour online.
- Everyone will act on online safety concerns in line with this safeguarding / child protection policy and associated policies and procedures.
- Staff are reminded and updated about online safety matters at least annually and this includes understanding the expectations, applicable roles and responsibilities in relation to cybersecurity, filtering and monitoring.
- We include online safety in the curriculum and ensure that every pupil has been educated about safe and responsible use.
- We ensure that delivery by external visitors is planned and fit for purpose⁵⁰
- We work hard to ensure that children, and parents, know how to minimise and manage online risks and that they know how to report any worries or concerns with adults / staff in school.

Online Safety -Key Personnel and Associated Policies

Mark Horsfall leads on Online Safety in school. Everyone is responsible for promoting and supporting safe behaviour in classrooms / around school and must adhere to acceptable use policies and online safety policies and procedures.

All staff are familiar with FT's Code of Conduct and Safe Working Practices (in particular section 11, 23, 24 and 31 and 'Acceptable IT Use for Staff and Volunteers' which is integral to induction and ongoing staff training / updates. This includes detailed guidance on⁵¹:

- Safe use of e-mail
- Safe use of Internet including use of internet-based communication services, such as instant messaging and social network
- Safe use of school network, equipment and data
- Safe remote education (which was particularly relevant during the pandemic)⁵²
- Safe use of digital images and digital technologies, such as mobile phones

⁴⁹ [LGFL Resources inc audit tool https://360safe.org.uk/](https://360safe.org.uk/)

⁵⁰ [UKCIS external visitors guidance](#)

⁵¹ For more detailed guidance please refer to Focus-Trust IT Use and Online Safety Policy <https://www.gov.uk/government/publications/providing-remote-education-guidance-for-schools>

- and digital cameras⁵³
- Publication of pupil information/photographs and use of website
- Online Bullying
- The conduct of and use of visiting speakers and their role in providing online safety education for pupils.

Parental Consultation and Engagement

We ask that parents and carers sign and return our online safety/AUP form and will continue to work hard to engage, educate and empower them. Our aim is to continue to raise awareness, identify any issues, trends or patterns, and to ensure that preventative and protective strategies are tailored and effective. We do this by using a range of vehicles and platforms to share reliable information and useful resources via our website, newsletters, and some face-to-face sessions⁵⁴

We will continue to work closely with them and share information pro-actively in individual cases, where it is safe and appropriate to do so.

Teaching Online Safety

We recognise that schools play an essential preventative role and governors ensure that we comply with statutory and non-statutory guidance and advice in order to ensure that our pupils are taught effectively about how to keep themselves and others safe, including online. This occurs as part of the provision of a broad and balanced curriculum. In so doing, we draw on tried and tested resources from reliable sources.

We are very mindful that a 'one size fits all' approach to online safety will not suit vulnerable children and that 'scare stories' and 'rules' alone will not have the desired impact. DSLs understand the unique risks associated with online safety and have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school. They also recognise the additional risks that children SEND and LAC pupils face online. Effective education is tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, LAC and children with special educational needs or disabilities.⁵⁵

Risk⁵⁶

The use of technology, including the internet, offers many opportunities for children, both socially and for their learning; however, it may also pose risks and technology often provides the platform that facilitates harm.

⁵³ [ICO guidance taking photographs in schools](#)

⁵⁴ www.thinkuknow.co.uk www.saferinternet.org.uk
<https://www.childnet.com/resources>

⁵⁵ [LAC digital passport](#) [SEND online safety resources hub](#)
<https://www.internetmatters.org/hub/resource/so-you-got-naked-online-send-version/>

⁵⁶ [Online harm & abuse Case Review analysis Oct 2022](#)

We are also mindful of the fact that the use of technology has become a significant component of many safeguarding issues such as CSE, radicalisation, sexual predation and young people may also engage in or be victims of such activities as 'sexting' [Youth Produced Sexual Imagery], cyber-bullying, 'upskirting', or Technology Assisted HSB (TA-HSB); all of which might have serious and long-lasting implications.

Broadly speaking, our approach is oriented around and seeks to address the 'four areas of risk' highlighted in KCSIE 2023, para.136, pages 35-6.

Contact	Content	Conduct	Commerce ⁵⁷
being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'	being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism	personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying	risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Guidance on Some Specific Issues

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either:

'cyber-enabled' (crimes that can happen off-line but are enabled at scale

⁵⁷ Issues for staff or pupils will be reported to <https://apwg.org/>

and at speed on-line) or **'cyber dependent'** (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

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

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

If there are concerns about a child in this area, the DSL will consider referring into the HO / NCA's Cyber Choices programme
[Cyber Choices](#),

Additional information and guidance can be accessed here:
[National Cyber Security Centre - NCSC.GOV.UK](#).

Technology Assisted Child Sexual Abuse (TA-CSA and TA-HSB)

Case reviews have highlighted the ways in which technology can be used to groom and perpetuate abuse. They have also highlighted key things which agencies and professionals should be mindful of if they encounter it:

- It can be more difficult to recognise abuse.
- Speed of occurrence.
- Technology can be used to initiate, escalate and maintain abuse.
- The outcome can be significant in terms of image control, permanence and the scope for re-victimisation;
- The dangers inherent in perceptions of victims having played an 'active' role in the abuse, which may be compounded by misconceptions or fears about criminal justice responses and implications.
- Professionals and services have sometimes viewed it as less serious (than contact offences / abuse) and responded less than robustly as a result.
- Young people have been 'blamed' and seen as having been complicit in their own abuse.

For clarity then, TA-CSA (Technology assisted child sexual abuse) and Technology Assisted Harmful Sexual Behaviour (TA-HSB) have the same degree of impact as offline sexual abuse. Technology provides additional routes both to access young people to abuse and to manipulate and silence them and there are additional

elements for young people to contend with, related to control, permanence, blackmail, re-victimisation and self-blame.

Youth Produced Imagery ('Sexting'), Sharing Nudes and Semi Nudes⁵⁸



Sometimes known as 'sexting', the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 has risen to prominence in recent years. This occurs via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices via services like Apple's AirDrop which works offline.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexual or criminal, e.g. it could happen within a romantic/sexual exploration scenario or be related to grooming / coercion. Once a message or image has been shared, the sender has no control about how it's used. Therefore, children and young people can be left vulnerable to bullying, blackmail, online grooming, sexual harassment⁵⁹ or abuse.

Guidance for Staff on How to Respond⁶⁰

Anyone who becomes aware of such an image must report the matter to the DSL immediately.

What to Do and What to Avoid

 Do	 Do NOT
<p>✓ Stay Calm</p>	<p>View, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal. (If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL and seek support)</p> <p>Delete the imagery or ask the young person to delete it</p> <p>Ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. (Leave this to the DSL)</p> <p>Share information about the incident with other members of staff, the young person(s) it involves or their / other parents and/or carers</p> <p>Say or do anything to blame or shame any young people.</p>
<p>✓ Listen carefully</p>	
<p>✓ Explain to them that you need to report it and reassure them that they will receive support and help from the DSL</p>	

It is a criminal offence to create or share explicit images of a child, even if the person doing it is a child. If a child (aged ten or over) does this, they are [technically] committing an offence.

⁵⁸ [UKCIS guidance on nudes and semi nudes](#)

⁵⁹ [Online sexual harassment toolkit](#) [Childnet protect deSHAME resources](#) : see sexual violence and sexual harassment for responses and management

⁶⁰ [UKCIS guidance for staff](#)

In January 2016, the Home Office launched *outcome 21* which states that "Further investigation, resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect is not in the public interest – police decision." This allows the police to record a crime as having happened but for no formal criminal justice action to be taken as it is not considered to be in the public interest to do so.

Any incidence of adults sharing nudes or semi-nudes of under 18-year-olds is a form of child sexual abuse and must be referred to the police as a matter of urgency.

The Serious Crime Act 2015 made it unlawful for an over 18 to intentionally communicate with a child under 16 for a sexual purpose. This includes talking sexually to a child in a chat room as well as sending sexual messages. In law, sending or possessing an indecent image (inc video) of a child under 18 is unlawful.

Reporting / Removing Images / Content

It may be necessary to assist a young person and / or parents in reporting and / or removing an image from a website or elsewhere. The DSL / DDSL should be aware of the following:

<https://www.thinkuknow.co.uk/parents/articles/Reporting-to-social-media-sites-/ChildLine-Report-Remove-Tool-2021>
[Internet Watch Foundation \(IWF\)](https://www.ceop.police.uk/ceop-reporting/)
<https://www.ceop.police.uk/ceop-reporting/>

Searching Devices⁶¹

The Education Act 2011 gives schools and/or teachers the power to seize and search an electronic device if they think there is good reason to do so.

The Dfe has agreed that it may be feasible for a **Designated Safeguarding Lead** to check a device where:

1. It is the only way to make a decision about whether to involve other agencies, i.e. it is not possible to establish the facts from the young person
2. It is necessary to report the image to a website, app or other agency so as to have the image removed, or to support the young person with this.
3. It is unavoidable because the young person presents the image directly or the image is found on an organisational device or network

It will be the DSL who is best placed to respond to concerns about online activity or incidents involving technology, in consultation with the ICT leader and providers where appropriate. Staff must consult with and report all safeguarding matters to them without delay.

The DSL will liaise with external agencies and professionals in order to assess risk and / or seek advice, ensuring that appropriate records are maintained and that safeguards, risk management and support strategies are put in place. They will assess and manage risk and put appropriate protection and support mechanisms in place without delay.

⁶¹ [DfE screening, searching and confiscation from Sept. 2022](#)

Guidance for Staff on Safe and Acceptable Use⁶²

Staff should also take extreme care to ensure that children and young people are not exposed, through any medium, to inappropriate or indecent images. There are no circumstances that will justify adults making, downloading, possessing or distributing indecent images or pseudo-images of children (child abuse images). Accessing these images, whether using the setting's or personal equipment, on or off the premises, or making, storing or disseminating such material is illegal.

If indecent images of children are discovered on academy or Trust equipment, the equipment should not be tampered with in any way. The images / equipment should be secured; there should be NO attempt made to view, search, save or delete the images. The DSL must be notified immediately. The DSL will seek advice from and make any appropriate referrals, e.g. LADO / Police / children's social care as appropriate.

Under no circumstances should any adult use school or setting equipment to access pornography. Personal equipment containing pornography or links to it should never be brought into or used in the workplace. To do so would raise serious concerns about the suitability of the adult to continue working with children and young people. Staff must adhere to the Trust's Acceptable Use Policy and the staff Code of Conduct, e.g. passwords must be kept confidential and they must not allow unauthorised access to equipment.

⁶² Ref: [SRC Safer Working Practice Guidance 2022](#)

**Photography, Videos and other Images / Media
A Quick Guide for Staff**

Staff SHOULD	Staff should NOT
<ul style="list-style-type: none"> • adhere to the Trust's policy; • only publish images of pupils where they and their parent/carer have given explicit written consent to do so; • only take images where the pupil is happy for them to do so; • only retain images when there is a clear and agreed purpose for doing so; • keep images only for as long as is agreed / absolutely necessary; • store images in an appropriate secure place in the school or setting; • ensure that a senior member of staff is aware that the photography/image equipment is being used and for what purpose; • be able to justify images of pupils in their possession; • avoid making images in one to one situations. 	<ul style="list-style-type: none"> • take images of pupils for their personal use; • display or distribute images of pupils unless they are sure that they have parental consent to do so (and, where appropriate, consent from the child); • take images of children using personal equipment; • take images of children in a state of undress or semi-undress; • take images of a child's injury, bruising or similar (e.g. following a disclosure of abuse) <u>even if requested by children's social care</u>; • make audio recordings of a child's disclosure take images of children which could be considered as indecent or sexual.

Part 5: Safeguarding Children in Specific Circumstances

Safeguarding SEND Children

Children with special educational needs (SEN), disabilities and/or medical conditions can face additional safeguarding challenges, not least because additional barriers can exist when it comes to recognising abuse and neglect:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further, appropriate exploration.
- There can be a reluctance to even consider the possibility that someone would abuse a disabled child.
- Being more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.
- Being more prone to peer group isolation than other children.
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

In order to address these additional challenges, we ensure that extra pastoral support is and attention is available for these children. We also ensure that we can communicate effectively. Disabled children might also suffer abuse other than via overt physical or sexual assaults. This means that staff need to think carefully and holistically about the needs of individual children in respect of things like privacy, dignity and respect, food, mobility, online activity, promoting positive behaviour, medication, finances, supervision, restraint, intimate care and the use of aids and adaptations.

We apply the principles and procedures laid-out in this and related policies to all children and the LGB scrutinises what we do in order to ensure that we remain compliant and effective. We will ensure that:

- We fulfil our duties under the Equality Act 2010 by relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.
- We know our children and their wider circumstances well.
- We work in partnership with parents, carers and other agencies / professionals.
- Key staff are absolutely familiar with relevant guidance protocols, procedures and documentation.
- Staff possess / develop the skills they need to give **all** children a 'voice' and, where necessary, to ensure that we are able to advocate effectively for them.
- Staff develop appropriate skills and knowledge around issues and conditions affecting individual children, accessing further and specialist training where

- necessary.
- Transitions are well planned and as smooth as possible.

We also plan carefully and in partnership so that we can deliver positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers. We also monitor, review and reflect on any issues or incidents in order to try and reduce the occurrence of behaviour which challenges and the need to use reasonable force.

Working closely alongside the Designated [LAC] teacher and SENDCO, the DSL will ensure that teaching staff are supported so they can identify the challenges that children who have or who have had a social worker might face even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes. Via its co-ordinated, whole-school approach, the academy will provide the additional support and adjustments that best support these children, and which help them reach their potential and stay safe.

LAC, Previously LAC and those with a Social Worker⁶³

We recognise and are very mindful of the fact that some children and young people are especially vulnerable because of the impact of previous experiences, their level of dependency, their communication needs, or other issues. Where children need a social worker, this informs decisions about safeguarding, e.g. responding to unauthorised absence or missing education where there are known safeguarding risks and about promoting welfare, e.g. for example, considering the provision of pastoral and/or academic support, alongside action by statutory services.

The most common reason for children becoming looked after is as a result of abuse and/or neglect. We ensure that staff have the skills, knowledge and understanding to keep looked after children safe. Awareness is raised by and reflected in policies such as this and consolidated in practice via staff training and induction across the Trust. For example, we ensure that:

- We have designated, qualified and well-trained staff in place.
- We promote and maintain a culture of high aspiration and the best possible outcomes for our most vulnerable children.
- within the boundaries of professional confidentiality, relevant information is made available to those who 'need to know' e.g. legal status, key personnel, contact arrangements and levels of delegated authority;
- We provide additional pastoral support.
- The LGB continually assesses how effectively we are using additional monies and resources.
- We plan carefully and review regularly in order to ensure a positive and proactive approach to behaviour support.
- We draw-up individual plans, in consultation with young people, parents, carers and other agencies / professionals, in-line with relevant guidance and

⁶³ See also FT LAC and previously LAC policy

- legislation.
- We liaise with key professionals, (e.g. social workers, Virtual Schools Heads), parents and carers to ensure that planning and support is effective, that any transitions are as smooth as possible and that these children are maximising their potential.

The DSL retains all details for social workers and the Virtual School Head in each of the authorities that look after our pupils⁶⁴. The Designated [LAC] Teacher⁶⁵ has accessed appropriate training and possesses the relevant qualifications and experience, in-line with national guidance⁶⁶. They work closely with local authorities to promote the educational achievement of registered pupils who are looked after, who have a social worker, have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales.

Note: KCSIE 2023, Annex B, pages 141-163.

Annex B provides further information on a wide-range of [safeguarding-related] issues. All staff who work directly with children have signed a declaration to confirm that they have read and understood that, alongside this policy. DSLs and DDSLs have read and understand the whole document and any associated guidance.

This policy already contains detailed information and clear steer for staff on the vast majority of those issues, e.g. CSE, county lines and CCE, modern slavery, sexual violence and sexual harassment, CME, children in alternative provision, 'honour' based abuse etc. On balance, therefore, it makes no sense to simply repeat that guidance in its entirety here.

We recognise that children and families may need extra help or support, that children may be especially vulnerable and that we may need to take action to safeguard and protect them in any and all of the contexts described in KCSIE 2023 Annex B. However, some legislation has changed, and staff are asked to consider the following information in addition to that contained within Annex B of KCSIE 2023.

Any and all information, concerns or reports in respect of the following will be brought to the attention of the DSL / DDSL without delay.

⁶⁴ [VSH and Promoting the education of children with SW 2022](#)

⁶⁵ [Designated LAC Teacher, DfE 2018](#)

⁶⁶ [Promoting the educational attainment of looked after and previously looked after children 2018](#)

Homelessness⁶⁷

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

The Homelessness Reduction Act 2017 placed a legal duty on English councils. It also shifted the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

Everyone who is homeless or at risk of homelessness should have access to meaningful help including:

- an assessment of their needs and circumstances
- the development of a personalised housing plan
- work to help them retain their accommodation or find a new place to live.

In school, the DSL / DDSLs are aware of contact details and referral routes into the Local Housing Authority. **(See contacts on pages 13-14 of this policy)**. This means they can raise/progress concerns at the earliest opportunity. They are also clear, however, **this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm⁶⁸**.

The 'Toxic Trio'⁶⁹

The term has been used to describe the issues of domestic abuse, mental ill health and substance misuse. Its use has been questioned in some quarters recently because:

- In reality, families' lives are often a lot more complex than the term suggests.
- Drinking, using drugs or experiencing mental health challenges do not in and of themselves or necessarily pose a risk of harm to children.
- Domestic abuse is, in itself, a form of child abuse - see over.

On balance, however, they continue to 'feature', often in combination', in serious case reviews and are significant factors in IPV (Interpersonal Violence) and AFV (Adult Family Violence). Research on Adverse Childhood Experiences (ACEs) also indicates that there is a significant overlap between these potential risk factors and outcomes for children into adulthood. Consequently, all staff should always be observant and mindful of the existence and potential impact on

⁶⁷ Homelessness reduction fact sheets https://england.shelter.org.uk/housing_advice

⁶⁸ Where 16 and 17 year old siblings may be concerned, statutory guidance has been produced [Factsheets Full guidance 16 and 17 yo Children's Commissioner August 2018 - Children's Voices and the Toxic Trio](#)

children of these issues and any concerns should be shared with the DSL / DDSL in school.

Domestic Abuse⁷⁰

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Domestic abuse can encompass, but is not limited to: psychological, physical, sexual, financial, emotional and recognised forms include;

- abuse by family members
- intimate partner violence
- teenage relationship abuse
- child/adolescent to parent violence and abuse.

Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'⁷¹.

Legislation

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

- Ensures that different types of relationships are captured, including ex-partners and family members.
- Captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.

Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Operation Encompass⁷²

Op. Encompass operates in all police forces across England and helps the

⁷⁰ [Domestic Abuse Case Reviews Analysis Oct 2022](#)

⁷¹ Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

⁷² <https://www.operationencompass.org/>

police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult in school before the child or children arrive at school the following day.

Operation Encompass Contacts within Thornhill Junior & Infant School are:

- Jen Rylance
- Jayde Weir
- Mark Horsfall
- Claire Hale
- Gemma Padgett
- Callum Ivel

This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass **does not** replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

Anyone who is worried about domestic abuse must always seek advice and support from the DSL / DDSL as soon as they become aware of the possibility of it. Obviously, sensitivity and the very careful management of information is imperative.

Domestic abuse is a safeguarding issue! Its impact, including controlling or coercive behaviour, was integrated into a revised version of Working Together to Safeguard Children. Also known as 'coercive control', the use of control and coercion in relationships is a form of domestic abuse and, since December 2015, a criminal offence. The Adoption and Children Act 2002 makes clear and explicit the need for professionals to always consider the need for a child protection referral in cases where children and young people are believed to have witnessed domestic abuse as they are at increased risk of suffering significant harm.

Risk

There is no such thing as a hierarchy of domestic abuse, it is all serious, potentially very harmful and can be life-threatening. Every person will respond differently and what is not particularly traumatic for one child and/or victim may be hugely so for another.

Prolonged and / or regular exposure to DA can have a serious impact on a child's development and emotional wellbeing, despite the best efforts of the victim/parent to protect the child. It can pose a threat to an unborn child, because assaults on pregnant women frequently involve punches or kicks directed at the abdomen, risking injury to both mother and foetus. It can also

lead to other possible risks, such as, foetal death, low birth weight, early birth, infection etc. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Most risk is fluid and dynamic which means that things can change very quickly. It is **not** for staff in schools to formally assess risk where there is domestic abuse. Formal risk assessments will be undertaken by Children's Services, Police and / or specialist domestic abuse agencies and / or personnel; this is complex and potentially dangerous work.

Research, serious case reviews and experience tell us that domestic abuse poses a particularly significant risk in some circumstances. Things to be mindful of include the following:

- Physical injuries being sustained, especially where they require hospital treatment (esp. if treatment is delayed or not sought).
- During pregnancy.
- Babies or disabled children are implicated.
- People are locked-in or prevented from leaving.
- Accompanying issues pertaining to culture and / or 'honour'.
- Where children and young people may be used as 'shields' and / or where their possessions are destroyed.
- Animals are harmed.
- The abuse is continuing / repeated or escalating.
- Control of finances.
- Sexual violence.
- Bizarre / ritualistic elements.
- Victim has left / plans to leave.
- Stalking / harassment.
- History of child protection / CP Plans previously or currently in place.
- Court Orders previously or currently in place, especially if there is breach.
- Research continues to remind us that suspected perpetrators of domestic abuse are not necessarily the individuals who pose the greatest risk of harm to a child in a relationship / household.

The following **might** indicate that some progress is being made and / or be potential signs of safety although they obviously offer no guarantees:

- Adults taking account of the impact or potential impact on children and taking appropriate steps to address behaviour.
- No evidence of children being directly involved (although they are still highly likely to know about, hear and / or see abusive behaviour).
- Evidence of protective / support networks.

It is important for assessments to consider and distinguish between immediate concerns for a child's safety and wellbeing and risks which can be mitigated with appropriate support. These judgements and decisions are usually best left to those with a detailed understanding of the issues and dynamics.

DSLs MUST seek appropriate and timely advice and should NOT act unilaterally. Sensitive information must be managed appropriately by DSL / DDSLs.

Children with a Family Member in Prison⁷³

Approximately 200,000 children have a parent sent to prison each year and we are mindful that these children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. For some children the process can feel very much like bereavement, and we will provide them with appropriate support at every stage.

It will be the DSL and Principal who lead in these circumstances. They will work closely with relevant staff in school as well as any other agencies and professionals involved, as required and in-line with locally agreed protocols and procedures. They may also draw upon the useful guidance provided by the National Information Centre on Children of Offenders (NICCO) which provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children and the Court System

There are various circumstances whereby the academy may need to support children in relation to court processes. For example:

- We might need to help them to understand a particular process.
- We might need to support them as part of a process involving parental separation or dispute(s) or care proceedings.
- They may be required to give evidence in court, and this can be stressful for them and their families.
- We may need to support children who are members of a family that has had to be relocated after threats have been made to them.

It will be the DSL and Principal who lead in these circumstances and they will work closely with relevant agencies and professionals, as required and in-line with locally agreed protocols and procedures.

Private Fostering⁷⁴

Most children spend some time staying with friends and relatives. However, in some situations the arrangements can become more permanent. If a child aged under 16 years (or 18 years if THEY ARE disabled) goes to live with a person who is not a close relative to them (e.g. a great aunt or a friend) for more than 28 days or more, this is known as private fostering and the local authority must be notified.

Private Fostering happens for lots of different reasons some of which include:

- Children living with a friend's family as a result of separation, divorce or problems at home.
- Children sent to this country for education or health care by birth parents

⁷³ [National Information Centre on Children of Offenders](#)

⁷⁴ [Private fostering: local authorities](#)

- living overseas.
- Teenagers living with the family of a boyfriend or girlfriend.
- Teenagers who have broken ties with their parents and are staying with friends or non-relative.
- Those living with host families whilst pursuing courses of study.

If a private fostering arrangement is brought to the attention of someone in school, the DSL must be informed. The DSL then has a duty to notify the local authority of the arrangement. Once notified, a social worker from the local authority will arrange to visit the child's parents, the private foster carers and the child themselves. They will keep in touch with those people at regular intervals in order to ensure that everything is going well. They will offer support and guidance to both the foster carers and parents, particularly in respect of making plans for the child's future and helping the child to keep in touch with their culture and background. The social worker will also offer advice on any welfare benefits that the private foster carers may be entitled to.

Young Carers

A young carer is a child (under 18) who helps look after a relative who has a condition, such as a disability, illness, mental health condition, or a drug or alcohol problem. Most young carers look after one of their parents or care for a sibling. Caring responsibilities can impact significantly on children and young people, both in and outside school. Staff have a central role to play in giving them a voice and helping them to reach their potential through the provision of emotional and practical support.

The Children and Families Act and Care Act 2014 strengthened the rights of young carers by giving them the right to be assessed, regardless of who they care for, what type of care they provide or how often they provide it. In addition, a young carer has the right to an assessment based on the *appearance* of need – which means that they do not need to request an assessment or be undertaking a 'regular and substantial' amount of care. (An assessment can be requested however).

When a child is identified as a young carer, the needs of everyone in the family are to be considered. In conducting assessments, local authorities are required to:

- Assess why a child is caring.
- What needs to change.
- What would help the family to prevent children from taking on this responsibility.
- Take a whole family approach, i.e. by assessing and supporting adults so that young carer's needs are identified when undertaking an adult or adult carer's needs assessment.
- Ensure that adult's and children's services work together to assess effectively.

For further information on all of the above issues please refer to Annex B of KCSIE 2023, pp.156-163.

