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Thongsley Fields Primary & Nursery School

# Safeguarding Policy

Keeping Children & Adults Safe

Version: 6

Reviewed: September 2023

Approved: Full Governing Body

Date: Autumn 2023



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**Key Contacts**

Role	Name	Telephone	Email
Designated Safeguarding Lead	Stella Frampton Inclusion Lead	Please make initial contact through the school office. Your details will be passed on to the relevant person as quickly as possible.  Telephone: (01480) 375321 Email: <a href="mailto:office@thongsleyfields.org">office@thongsleyfields.org</a>  Alternatively, the safeguarding team can be contacted in confidence by emailing:  Email: <a href="mailto:safeguarding@thongsleyfields.org">safeguarding@thongsleyfields.org</a>	
Deputy Designated Safeguarding Lead	David Jones Headteacher		
Deputy Designated Safeguarding Lead	Lauren West Deputy Headteacher		
Deputy Designated Safeguarding Lead	Philie Forster Nursery Lead		
Single Point of Contact (SPOC) & Domestic Abuse Lead	Stella Frampton Inclusion Lead	As above	As above
Safeguarding Governor	Kris Stutchbury	School Office 01480 375321	clerk@thongsleyfields.org

Name	Telephone	Email
Customer Service Centre Social Care Referrals	0345 045 5203	
Emergency Duty Team (Out of hours)	(01733) 234724	
Early Help Hub (EHH) (Targeted Support Service)	(01480) 376666	
Police Child Abuse Investigation Unit	101 999 (in an emergency)	mash.cp@cambs.pnn.police.uk
Police Prevent Officers	(01480) 422596	prevent@cambs.police.uk
LA Designated Officer (LADO)	(01223) 727967	LADO@cambridgeshire.gov.uk

Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding Inter-Agency Procedures

<http://www.safeguardingcambspeterborough.org.uk/children-board/>

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**1. Introduction**

- 1.1. Thongsley Fields Primary School fully recognises the responsibility it has under section 175 of the Education Act 2002 (as amended) to have arrangements in place to safeguard and promote the welfare of children.
- 1.2. This responsibility is more fully explained in the statutory guidance for schools and colleges *'Keeping Children Safe in Education'* (September 2023). All staff must be made aware of their duties and responsibilities under part one of this document (set out below).
- 1.3. Staff should read the above document together with *'Annex B'* of *'Keeping Children Safe in Education'* (2023) if they are working directly with children. For those staff who do not work directly with children or where English is a second language, Annex A may be issued instead.
- 1.4. Through their day-to day contact with pupils and direct work with families, all staff in school have a responsibility to:
  - Identify concerns early to prevent them from escalating
  - Provide a safe environment in which children can learn
  - Identify children who may benefit from early help
  - Know what to do if a child tells them he/she is being abused or neglected
  - Follow the referral process if they have a concerns.
- 1.5. This policy sets out how the school's governing body discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the school.
- 1.6. The policy is consistent with the Safeguarding Children Partnership Board procedures.
- 1.7. There are four main elements to our policy:

**PREVENTION** through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole school protective ethos

**PROCEDURES** for identifying and referring cases, or suspected cases of abuse or exploitation. The definitions of the four categories of abuse are attached (see Appendix A)

**SUPPORTING VULNERABLE CHILDREN** - those who may have been abused or witnessed violence towards others

**PREVENTING UNSUITABLE PEOPLE WORKING WITH CHILDREN** - processes are followed to ensure that those who are unsuitable to work with children are not employed.
- 1.8. Our policy applies to all staff and volunteers working in the school including community education staff and governors. Teaching assistants, mid-day supervisors, administrators as well as teachers can be the first point of disclosure for a child. Concerned parents may also contact the school or any of the school governors.
- 1.9. The school recognises it is responsible for making referrals and not for making enquiries and investigating. Any referrals will normally made by the school's Designated Safeguarding Leads, as this aids consistency and careful monitoring. However, in an emergency or a genuine concern that appropriate action has not been taken, other staff members can speak directly to Children's Social Care.

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1.10. This policy is available to parents on request and is on the school website.

**2. PREVENTION**

2.1. We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult helps to protect children.

2.2. This school will therefore:

2.2.1. establish and maintain an ethos and environment where children feel safe, including in a digital context, and are encouraged to talk, and are listened to;

2.2.2. ensure children know that there are trusted adults in the school whom they can approach if they are worried or in difficulty and that their concerns will be taken seriously and acted upon as appropriate;

2.2.3. tailor our curriculum to be age and stage of development appropriate so that it meets the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

2.2.4. incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality.

2.2.5. ensure that all school staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our 'Responding to Prejudice-Related Incidents Policy'.

2.2.6. incorporate into the curriculum, activities and opportunities which equip children with the skills they need to stay safer from abuse and exploitation in all contexts, including:

- how to recognise if family relationships are making them feel unhappy or unsafe and how to seek help or advice from others if needed;
- how to recognise who to trust and who not to trust, how to judge when a friendship is making them feel unhappy or uncomfortable and how to seek help or advice from others, if needed;
- the importance of permission-seeking and giving in relationships with friends, peers and adults;
- that some people behave differently online, including by pretending to be someone they are not;
- the rules and principles for keeping safe online, how to recognise risks, harmful context and contact and how to report them;
- how to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met;
- about the concept of privacy and the implications of it for both children and adults;
- including that it is not always right to keep secrets if they relate to being safe;
- that each person's body belongs to them, and the differences between appropriate and inappropriate or unsafe physical, and other, contact;

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- how to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know;
- how to recognise and report feelings of being unsafe or feeling bad about any adult or other children;
- how to ask for advice or help for themselves or others, and to keep trying until they are heard;
- how to report concerns or abuse, and the vocabulary and confidence needed to do so;
- where to get advice e.g. family, school and/or other sources.

Relationships Education, Relationships and Sex Education (RSE) & Health Education (DfE 2021)

- 2.2.7. We use the Personal Safety Units from the Cambridgeshire PSHE Service Personal Development Programme. These units support children to recognise if they are feeling safe or unsafe in their relationships with family, friends and online. This includes considering the importance of permission seeking and giving in relationships, and the sort of boundaries which are appropriate both on and offline. Children are encouraged to consider the qualities they would look for in a trusted adult, how to judge whether a secret feels safe or unsafe and how to seek support if they are asked to keep an unsafe secret. Children learn that each person's body belongs to them, the correct language for body parts, including genitals, how to identify unsafe or inappropriate physical contact. With the older children, they learn about what sorts of behaviours constitute abuse and neglect (PS5-6). All children have opportunities to practice seeking help or advice from others, including from their Networks of Support, and develop their problem-solving strategies, which can be applied in a range of contexts.
- 2.2.8. We use the Safer Spaces Toolkit developed by the Cambridgeshire PSHE Service which supports schools with listening to pupil voice, building awareness and engaging in reflection as part of a whole school approach to preventing sexist attitudes and behaviours which cause others to feel unsafe.

### **3. PROCEDURES**

- 3.1. The school will follow the procedures set out in the Cambridgeshire & Peterborough Safeguarding Children Partnership Board 'Multi-Agency Procedures.' A copy of these procedures can be found on the LSCB website:  
<https://www.safeguardingcambspeterborough.org.uk/children-board/professionals/procedures/>
- 3.2. The Governing Body will:
- 3.2.1. Appoint a senior member of staff, from the leadership team, to the role of Designated Safeguarding Lead (DSL). The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Lead, DDSL), the lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

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- 3.2.2. Ensure that the role of DSL and DDSL is explicit in the role holder's job description (as outlined in Keeping Children Safe in Education, 2023 Annex C).
- 3.2.3. Ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post. Give the DSL the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. (See 'Keeping Children Safe in Education, 2023, Annex C). Ensure that the DSL and deputies have undertaken the two-day training provided by the Education Safeguarding Team and that this training is updated **at least every two years**.
- 3.2.4. Ensure that in addition to the formal training set out above, the DSL and DDSLs refresh their knowledge and skills e.g. via updates, meetings or additional training **at least annually**.
- 3.2.5. Ensure that every member of staff, paid and unpaid, and the governing body knows who the Designated Safeguarding Leads and Deputies are and the procedures for passing on concerns from the **point of induction**.
- 3.2.6. The DSL and DDSLs make up the school safeguarding team and meet regularly to share information, discuss individual cases, disseminate best practise and any necessary changes to school procedures and support each other in carrying out their duties.
- 3.2.7. Ensure that there is always at least one member of the school's Safeguarding Team available during school hours, during term time to discuss any safeguarding concerns and that all staff are clear upon the course of action they must take if in exceptional circumstances the DSL and DDSL are not available. Mobile telephone numbers of the DSL and DDSLs are made available to staff outside of these times. *Staff should speak to a member of the safeguarding team and/or take advice from social care where appropriate.*
- 3.2.8. Liaise with the three safeguarding partners (Local Authority, Integrated Care Board and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018.
- 3.2.9. Nominate a governor for Safeguarding and Child Protection, who has undertaken appropriate training.
- 3.2.10. Ensure that every member of staff (paid and unpaid) and every governor knows:
- the name of the Designated Safeguarding Lead (and deputies) and their role
  - how to identify the signs of abuse and neglect, understanding that children can be at risk of harm inside and outside of the school, inside and outside of the home and online
  - that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful
  - how to pass on and record concerns about a pupil
  - that they have an individual responsibility to be alert to the signs and indicators of abuse and exploitation and for referring safeguarding concerns to the DSL/DDSLS
  - what is meant by, and the importance of, showing a professional curiosity
  - that they have a responsibility to provide a safe environment in which children can learn

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- where to find the Multi-Agency Procedures on the Safeguarding Children Partnership Board website
  - their role in the Early Help process
  - the process for making referrals to Children’s Social Care
  - the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
  - the role of filtering and monitoring and the process for reporting issues.
- 3.2.11. Ensure all staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction. The training should be **regularly updated**, as required, and **at least annually**, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- 3.2.12. Ensure that **all** staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children, and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies, including low level concerns and allegations against staff.
- 3.2.13. Ensure that parents are informed of the responsibility placed on the school and staff in relation to safeguarding and child protection by setting out these duties in school brochures, welcome/induction information and website.
- 3.2.14. Ensure that this policy is available publically, either via the [school website](#) or by other means.
- 3.2.15. Help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including children with a social worker) are experiencing/have experienced with teachers and school and leadership staff.
- 3.2.16. Where pupils are educated off site or in alternative provision, the school and the provider will have clear procedures about managing safeguarding concerns between the two agencies. Written confirmation that the alternative provider has carried out appropriate safeguarding checks on individuals working at the establishment will be sought by the school.
- 3.3. Multi-Agency Working**
- The school will:
- 3.3.1. work to develop effective links with relevant services to promote the safety and welfare of all pupils;
- 3.3.2. cooperate as required, in line with *‘Working Together to Safeguard Children’* (July 2018), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups;



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3.3.3. notify the relevant Social Care Unit immediately if:

- it should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently)
- there is an unexplained absence of a pupil who is subject to a Child Protection Plan
- there is any change in circumstances to a pupil who is subject to a Child Protection Plan.

3.3.4. ensure that when a pupil who is subject to a child protection plan leaves, information is transferred to the new school immediately. The Child Protection Chair and Social Care Team will also be informed.

### 3.4. Record Keeping

The school will:

3.4.1. keep clear, detailed, accurate written records of concerns about children (noting the date, event and action taken), even when there is no need to refer the matter to Children's Social Care immediately;

3.4.2. ensure all concerns, discussions, decisions made and the reasons for those decisions, are recorded in writing.

3.4.3. records should include:

- a clear and comprehensive summary of the concern
- the child's wishes and feelings
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome
- a record of any discussions or communication with parents, other agencies, etc.
- ensure that electronic records are stored on an identified, purpose-built, secure platform (e.g. MyConcern);

3.4.4. ensure all relevant safeguarding and child protection records are sent to the receiving school or establishment when a pupil moves schools, within five days, in accordance with *'Keeping Children Safe in Education'* (2023) (page 167) and the Education Safeguarding Team's *Guidance on Keeping and Managing Child Safeguarding Records*.

The DSL will consider whether it would be appropriate to share information with the new school in advance of a child leaving.

3.4.5. make parents aware that such records exist, except where to do so would place the child at risk of harm.

3.4.6. ensure all actions and decisions are led by what is considered to be in the best interests of the child.

### 3.5. Confidentiality and information sharing

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- 3.5.1. Information about children and their families is defined as 'special category data', i.e. information that identifies a living individual. Collection, storage and sharing of personal data is governed by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

The school will:

- 3.5.2. ensure that staff and volunteers adhere to confidentiality protocols and that information is shared appropriately.
- 3.5.3. Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in *'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,'* DfE, July 2018).
- 3.5.4. Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent, they will refer the request to the DSL and Headteacher.
- 3.5.5. Ensure staff are clear with children that they cannot promise to keep secrets.

The Designated Safeguarding Lead/Deputies will:

- 3.5.6. Disclose information about a pupil to other members of staff on a 'need to know' basis, considering what is necessary, proportionate and relevant. Parental consent may be required.
- 3.5.7. **Aim** to gain consent to share information and **be mindful of situations where to do so would place a child at increased risk of harm.** Information may be shared without consent where to do so might place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime.
- 3.5.8. Record when decisions are made to share or withhold information, who information has been shared with and why. (See *'Working Together to Safeguard Children,'* July 2018)
- 3.5.9. In cases where the 'serious harm test' is met, schools must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.
- 3.5.10. Seek advice about confidentiality from outside agencies if required. (See *'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,'* DfE, July 2018).
- 3.6. **Communication with parents/carers**

The school will:

- 3.6.1. ensure that parents/carers are informed of the responsibility placed on the school and staff in relation to child protection by setting out its duties on the school website.
- 3.6.2. undertake appropriate discussion with parents/carers prior to involvement of another agency unless specific circumstances preclude this.

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- 3.6.3. record what discussions have taken place with parents or if a decision has been made not to discuss it with parents, for example if the school believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime, the rationale must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

**3.7. Child-on-Child Abuse**

- 3.7.1. We recognise that child on child abuse can manifest itself in many ways. This can include but is not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting part of the Voyeurism (Offences) Act, April 2019) and initiation/ hazing type violence and rituals. 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.

- 3.7.2. All forms of child-on-child abuse are unacceptable and will be taken seriously.

The school will therefore:

- 3.7.3. create a whole school protective ethos in which child on child abuse, including sexual violence and sexual harassment will not be tolerated;
- 3.7.4. provide training for staff about recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators;
- 3.7.5. ensure that staff do not dismiss instances of child-on-child abuse, including sexual violence and sexual harassment as an inevitable part of growing up or 'banter';
- 3.7.6. include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online;
- 3.7.7. provide high quality Relationship and Sex Education (RSE) and/or enrichment programmes including teaching about consent;
- 3.7.8. ensure that staff members follow the procedures outlined in this policy when they become aware of child-on-child abuse, referring any concerns of child-on-child abuse to the Designated Safeguarding Lead (or deputy) in line with safeguarding reporting procedures.
- 3.7.9. ensure staff are aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk. School will ensure that these children have a trusted adult in school to talk to.

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- 3.7.10. recognise the risk of intra familial harms and provide support to siblings following incidents when necessary.
  - 3.7.11. expect the DSL (or DDSLs) to refer to the Safeguarding Children Partnership Board's [Child Sexual Behaviour Assessment Tool](#) if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse.
- 3.8. Dealing with Sexual Violence and Sexual Harassment between children**
- 3.8.1. Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
  - 3.8.2. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.  
  
The school will:
    - 3.8.3. Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.
    - 3.8.4. Provide training for staff on how to manage a report of sexual violence or sexual harassment.
    - 3.8.5. Make decisions on a case-by-case basis.
    - 3.8.6. Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making.
    - 3.8.7. Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review.
    - 3.8.8. Consider the welfare of both the victim(s) and perpetrator(s) in these situations.
    - 3.8.9. Liaise closely with external agencies, including police and social care, when required.
    - 3.8.10. Refer to 'Keeping Children Safe in Education - Part Five', 2023, for full details of procedures to be followed in such cases. Also see 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020)

**4. SUPPORTING CHILDREN**

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- 4.1. At Thongsley Fields, we recognise that **any** child may be subject to abuse and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and as such will support all children by:
- 4.1.1. Providing curricular opportunities to encourage self-esteem and self-motivation.
  - 4.1.2. Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community.
  - 4.1.3. Applying the school's behaviour policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the pupil's sense of self-worth. The school will ensure that the pupil knows that some behaviour is unacceptable but s/he is valued and not to be blamed for any abuse which has occurred.
  - 4.1.4. Liaising with the senior mental health lead where safeguarding concerns are linked to mental health in school/college for advice on case management.
  - 4.1.5. Liaising with other agencies which support the pupil such as Social Care, Child and Adolescent Mental Health Services, Emotional Health and Well-Being Service, Cambridgeshire Sexual Behaviour Service or Early Help (Targeted Support) Teams.
  - 4.1.6. Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- 4.2. The school recognises that whilst **any** child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances. Please see page 9 of Keeping Children Safe in Education, 2022 for the complete list. The list includes:

4.2.1. **Children with Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs**

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

The school has pupils with emotional and behavioural difficulties and/or challenging behaviours. The school will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHE curriculum staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as:

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- how to recognise if they are feeling unsafe including within family relationships and friendships;
- how to ask for help; the difference between safe and unsafe secrets;
- the difference between safe and unsafe physical contact;
- and how to recognise and manage risk including online.

The content of lessons will be shared with parents/carers so that these skills can be supported at home.

The school has pupils who may have communication difficulties and we are aware that they are vulnerable to abuse because they are unable to express themselves to others. Instead such children will often exhibit changes in behaviours or signs and indicators of abuse recognised by staff with a good knowledge of the child.

Where necessary, the school will provide additional training to staff in the use of Makaton, PECS or other communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the child.

Under the Equality Act, there is also a duty to make reasonable adjustments for disabled children and young people.

We promote high standards of practice, including ensuring that disabled children know how to raise concerns, and have access to a range of adults with whom they can communicate.

### **4.2.2 Young Carers**

The school recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

School will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or Social Care as required if concerns arise.

### **4.2.3 Children at Risk of Criminal Exploitation (inc. County Lines)**

Criminal exploitation of children is a form of harm that is a typical feature of county lines activity. Drug networks or gangs exploit children and young people to carry drugs and money from urban areas to suburban and rural areas. Exploitation can occur even if activity appears to be consensual.

All staff will consider whether children are at risk of abuse or exploitation in situations outside their families. School will address indicators of child criminal exploitation with staff through training. Staff will follow the procedures outlined in this policy if concerns of criminal exploitation arise.

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The Designated Safeguarding Lead will complete Safeguarding Children Partnership Board's [Exploitation Risk Assessment and Management Tool](#) and refer to Social Care if there is a concern that a young person may be at risk of criminal exploitation.

The school recognises that young people who go missing can be at increased risk of child criminal exploitation, modern slavery and/or trafficking and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

### **4.2.4 Children Frequently Absent from Education**

The school recognises that children who are absent from education, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, modern slavery, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The school monitors and follows up on the attendance of individual pupils closely, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.

The school endeavours to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child who is absent from education is identified as a welfare and/or safeguarding concern.

When a child is absent from education, the school follows the procedure as set out in Cambridgeshire's Children Missing Education guidance. The school will inform Social Care if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns.

### **4.2.5 Children Misusing Drugs or Alcohol**

The discovery that a young person is using illegal drugs or reported evidence of their drug use is not necessarily sufficient in itself to initiate child protection proceedings but the school will consider such action in the following situations:

When there is evidence or reasonable cause:

- to believe the young person drug misuse may cause him or her to be vulnerable to other abuse such as sexual abuse;
- to believe the pupil's drug related behaviour is a result of abusing or endangering pressure or incentives from others, particularly adults;
- where the misuse is suspected of being prompted by serious parent/ carer drug misuse;
- where the misuse indicates an urgent health or safeguarding concern;
- where the child is perceived to be at risk of harm through any substance associated criminality.

### **4.2.6 Children at Risk of Child Sexual Exploitation (CSE)**

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Child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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.

Potential indicators of sexual exploitation will be addressed within staff training, including raising awareness with staff that some young people who are being sexually exploited do not show any external signs of abuse and may not recognise it as abuse. Staff will follow the procedures outlined in this policy if concerns of child sexual exploitation arise.

The Designated Safeguarding Lead will complete the Safeguarding Children Partnership Board's [Exploitation Risk Assessment and Management Tool](#) and refer to Social Care if there is a concern that a young person may be at risk of CSE.

The school recognises that young people who go missing can be at increased risk of sexual exploitation and has procedures in place to ensure appropriate response to children and young people who go missing, particularly on repeat occasions.

At Thongsley Fields we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have gone missing through the Operation Encompass scheme. Cambridgeshire's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

### **4.2.7 Children of Substance Misusing Parents/Carers**

Misuse of drugs or alcohol is strongly associated with Significant Harm to children, especially when combined with other features such as domestic violence.

When the school receives information about drug and alcohol abuse by a child's parent/carers they will follow appropriate procedures.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children
- Children exposed to unsuitable care givers or visitors, e.g. customers or dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour



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- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods as a result of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment
- Drugs and/or alcohol having an adverse impact on the growth and development of an unborn child.

### **4.2.8 Children Living with Domestic Abuse**

The Domestic Abuse Act 2021 applies to those aged 16 and over and 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.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

Domestic Abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are 'personally connected' regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial and emotional, coercive or controlling behaviour.

The school recognises that where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic Abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of Domestic Abuse arise. The school will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

At Thongsley Fields, we are working in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass.

In order to achieve this, Cambridgeshire's Education Safeguarding Team will share police information of all domestic incidents to which Police have been called, where one of our

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pupils has been present, with the Designated Safeguarding Lead(s) (DSL)/Domestic Abuse (DA) Lead.

On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing and resulting actions will be undertaken in accordance with the 'Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Colleges and Early Years settings'.

### **4.2.9 Children at risk of 'Honour Based' Abuse including Female Genital Mutilation (FGM)**

So called 'honour-based' abuse (HBA) encompasses incidents which have been committed to protect or defend the honour of the family and/or community, including breast ironing, female genital mutilation (FGM) and forced marriage. The school takes these concerns seriously and staff are made aware of the possible signs and indicators that may alert them to the possibility of HBA through training. Staff are required to treat all forms of HBA as abuse and follow the procedures outlined in this policy.

The new Marriage and Civil Partnership (Minimum Age) Act 2023 bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18. It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

School will manage any concerns relating to forced marriage sensitively and will report concerns immediately via the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is under 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

### **4.2.10 Children who have returned home to their family from care**

The school recognises that a previously looked after child potentially remains vulnerable. School will vigilantly monitor the welfare of previously looked after children, keep records and notify Social Care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Multi - Agency Procedures.'

### **4.2.11 Children showing signs of Abuse and/or Neglect**

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The school recognises that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

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

The school will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy. The definitions of the four categories of abuse are attached (see Appendix A).

### **4.2.12 Children at Risk of Radicalisation**

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

The governing body will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent Duty.

The **Designated Safeguarding Lead is the Prevent Lead for our school** and has also completed appropriate Prevent Lead training.

Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

See also 'The Prevent Duty, Departmental advice for schools and childcare providers', DfE (June 2015), and 'Revised Prevent Duty Guidance: for England and Wales,' HM Government, (April 2021).

### **4.2.13 Privately Fostered Children**

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

The school will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements and refer to the Specialist Fostering Team.

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

The school is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.

The school recognises that children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.

The school will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

The school will work with the family, specialist organisations and the child to minimise the risk of the child not achieving their full potential.

### **5. PREVENTING UNSUITABLE PEOPLE FROM WORKING WITH CHILDREN**

- 5.1. The school will operate safe recruitment practices including ensuring pre-employment checks, and appropriate DBS and reference checks are undertaken according to '*Keeping Children Safe in Education*'. (DfE 2023). This section should be read in conjunction with the school's Safer Recruitment Policy.
- 5.2. The governing body will ensure that at least one person on any appointment panel has undertaken safer recruitment training. The Headteacher, Deputy Headteacher and Office Manager have all completed the Safer Recruitment training.
- 5.3. **Allegations that may meet the harms threshold (Part Four, Section One)**
  - 5.3.1. Any allegation of abuse made against teachers, (including supply staff, other staff, volunteers and contractors) that meets the harms threshold as set out in *Keeping Children Safe in Education, 2023, Part Four, Section One*, will be reported straight away to the Head Teacher.
  - 5.3.2. In cases where the Head Teacher is the subject of an allegation, it will be reported to the Chair of Governors. The school will follow the procedures set out in Part Four of '*Keeping Children Safe in Education*', 2023.
  - 5.3.3. The school will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against a teacher, member of staff, volunteer, contractor or agency/supply staff and adhere to the relevant procedures set out in '*Keeping Children Safe in Education*', 2023, Part Four and the school's HR policies, and seek advice from their HR provider.
  - 5.3.4. The Headteacher will ensure that all allegations are reported to the LADO within one working day. The LADO will advise on all further action to be taken.
  - 5.3.5. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. Schools will use the guidance chart found at Appendix B to support their decision-making.

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- 5.3.6. Where the school identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children's social care and, as appropriate, the police immediately.
- 5.3.7. School will consider:
- **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
  - **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- 5.3.8. The school will ensure that any disciplinary proceedings against staff, supply staff or volunteers relating to child protection matters are concluded in full even when the member of staff, supply staff or volunteer is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
- 5.3.9. Staff (including supply staff and volunteers) who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension should not be an automatic response when an allegation is reported. However, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.
- 5.4. **Concerns that do not meet the harms threshold (Part Four, Section Two)**
- 5.4.1. Low level concerns that do not meet the harms threshold should be reported to the Headteacher. NB: The term low level does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms test.
- 5.4.2. In cases where the Head Teacher is the subject of an allegation, it will be reported to the Chair of Governors. The school will follow the procedures set out in Part Four, Section Two of 'Keeping Children Safe in Education', 2023.
- 5.4.3. The school will deal with any such concern, no matter how small, where an adult working in or on behalf of the school or college may have acted in a way that:
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
  - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- 5.4.4. All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

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- 5.4.5. Schools can decide where these records are kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). At Thongsley Fields, the Headteacher will maintain digital records held securely from other files and access.
- 5.4.6. The school will promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This will enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.
- 5.4.7. The school should ensure that **all** staff (paid and unpaid) and including supply staff, volunteers and contractors, are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the Local Authority's Code of Conduct: 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022). As part of the Induction process, all staff (paid and unpaid) and including supply staff, volunteers and contractors, will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.
- 5.5. All staff have signed to confirm that they have read 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2022).
- 5.6. The school will ensure that staff, supply staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

## **6. Other Related Policies & Procedures**

### **6.1. Use of Mobile Phones and other 'Smart Devices' Policy**

Our policy on the use of mobile phones, other 'smart devices', cameras and sharing of images is set out in a separate document and is reviewed annually. It is recognised that personal mobile phones have the potential to be used inappropriately and therefore the school has developed a policy to outline the required protocol for all staff, pupils, volunteers and parents/carers.

## **7. Governing Body Safeguarding Responsibilities**

- 7.1. Governing bodies should ensure they facilitate a whole school/college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- 7.2. The governing body fully recognises its responsibilities with regards to safeguarding and promoting the welfare of children. It aims to ensure that the policies, procedures and

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training in school are effective and comply with the law and government guidance at all times.

It will:

- nominate a governor for safeguarding who will take leadership responsibility for the school's safeguarding arrangements and practice and champion safeguarding issues.
- ensure that all governors and trustees receive appropriate governor safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated.
- ensure governors and trustees are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 201022, the Public Sector Equality Duty and the local multi-agency safeguarding arrangements.
- ensure an annual safeguarding report {Annual Safeguarding Monitoring Report for Governors) is made to the full governing body and copied to the Education Safeguarding Team. Any weaknesses will be rectified without delay.
- ensure that this Safeguarding and Child Protection policy is annually reviewed, ratified, updated and understood and followed by all staff.
- ensure that this Safeguarding and Child Protection policy is published on the school website.
- ensure that children's exposure to potential risks while using the internet is limited by having in place age-appropriate filtering and monitoring systems and ensure that the effectiveness is regularly reviewed.
- ensure children's wishes and feelings are taken into account where there are safeguarding concerns.

### **8. Use of school/college premises for non-school/college activities**

- 8.1. If the governing body provides extended school facilities or before or after school activities directly under the supervision or management of school staff, the school's arrangements for safeguarding as written in this policy shall apply.
- 8.2. Where services or activities are provided separately by another organisation or individual, either on or off school site, the governing body will seek assurance that they have appropriate policies and procedures in place to keep children safe and there are arrangements to liaise with the school on these matters where appropriate.
- 8.3. The governing body will use the guidance on 'Keeping children safe in out-of-school settings' which details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

### **9. Monitoring & Evaluation**

- 9.1. Our Safeguarding and Child Protection policy and procedures will be monitored and evaluated by:
  - Governing Body visits to the school
  - SLT 'drop ins' and discussions with children and staff

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- Pupil surveys
- Scrutiny of attendance data
- Scrutiny of a range of risk assessments
- Monitoring of logs of concerns, behaviour and prejudice related incidents
- Review of parental concerns

**10. Complaints**

- 10.1 If a parent wishes to complain about this policy they should, in the first instance, raise informally with the Designated Safeguarding Lead who will try to resolve the situation. Any issues that remain unresolved at this stage will be managed according to the school's Complaints Policy. This is available, on request, from the school office.



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**Appendix B**

**FOUR CATEGORIES OF ABUSE**

**Abuse** - a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

- **Physical Abuse** - may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Neglect** - 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. It may occur during pregnancy as a result of maternal substance misuse. It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers failing to:

- Provide adequate food, clothing and shelter including exclusion from home or abandonment
  - Protect a child from physical and emotional harm or danger
  - Ensure adequate supervision including the use of inadequate care-givers
  - Ensure access to appropriate medical care or treatment
- **Emotional Abuse** - Is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

- Worthless
- Unloved
- Inadequate
- Valued only insofar as they meet another person's needs

It may include:

- not giving the child opportunities to express their views
- deliberately silencing them
- 'making fun' of what they say or how they communicate.

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- interactions that are beyond the child's developmental capability
- overprotection and limitation of exploration and learning
- preventing participation in normal social interaction.

It may involve:

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- seeing or hearing the ill-treatment of another
- serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger
- the exploitation or corruption of children.

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

- **Sexual Abuse** – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

This may involve:

- physical contact including assault by penetration (e.g. rape or oral sex)
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- non-contact activities involving:
  - children in looking at, or in the production of, sexual images,
  - children in watching sexual activities
  - or encouraging children to behave in sexually inappropriate ways
  - a child in preparation for abuse (including via the internet).

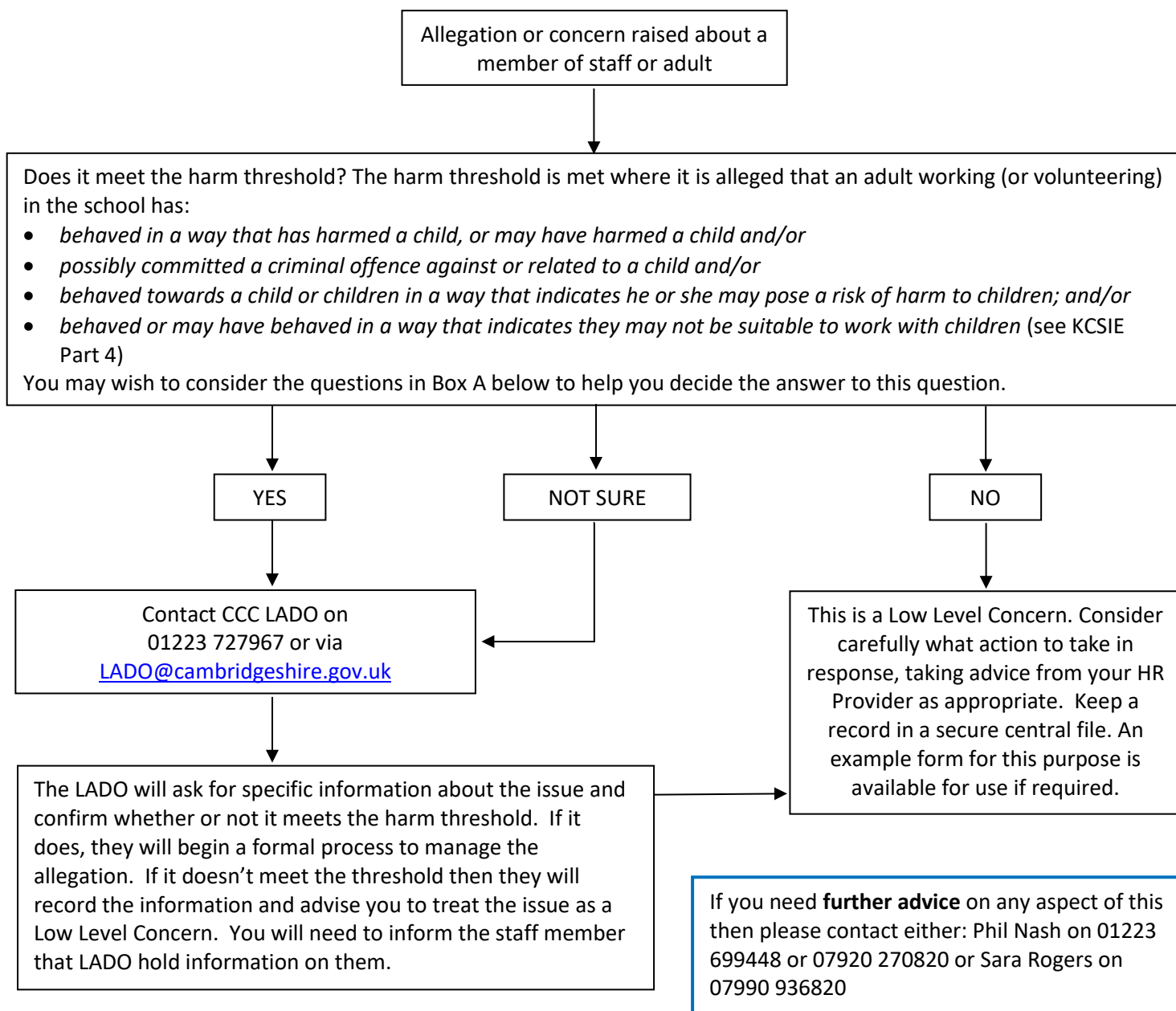
Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Child Criminal Exploitation** - Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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Appendix B

Dealing with Allegations or Concerns about an Adult Working with Children



Box A:

- How long has the adult or member of staff worked for you?
- Have there been any previous concerns raised?
- Is this a one-off or part of a pattern of behaviour?
- Has the member of staff previously been given advice in this area?
- Would an associated pattern of behaviour (if it exists) be seen by others? (How closely do they work with other colleagues?)
- Might this have been a planned action or event?
- Could this behaviour be inadvertent? What is the likelihood of this?
- Could this be the precursor to more concerning behaviour?
- Did it occur in a 'public' or 'private' place? Was this in school or out of school?
- If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?
- If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?