

SAFEGUARDING (CHILD PROTECTION) POLICY

This policy applies to Hereford Cathedral School, including Hereford Cathedral Junior School and the Early Years Foundation Stage.

Those parts of the policy which apply to one section of the School only have been clearly identified.

CONTENTS

1. Introduction
2. a. Policy and procedures for dealing with concerns about a child
b. Advice on how to behave when in receipt of a disclosure
3. Arrangements for handling low-level concerns and allegations of abuse against members of staff (including the Head and DSL), supply staff, volunteers and contractors.
4. Staff Code of Conduct – guidelines aimed at preventing pupils and staff being at risk of harm or at risk of allegations of causing harm
5. Whistleblowing procedures
6. Recruitment procedures, including arrangements for visiting speakers
7. Management of safeguarding - identities, roles and responsibilities
8. Training
9. Arrangements for reviewing the School's safeguarding/child protection policies and procedures annually
10. Arrangements to fulfil other safeguarding and welfare responsibilities

Addendum (COVID-19) for use in the event of a partial or whole school closure

Appendix A – Contact Details

Appendix B – Signs of Possible Child Abuse

Appendix C - Camera Policy and Policy for Acceptable Use of Personal Mobile Devices by School Employees

Appendix D: Managing Allegations which may meet the harms threshold

Appendix E: Managing Concerns which do not meet the harm threshold ('Low Level Concerns')

Appendix F – A Complete and Exact Copy of Keeping Children Safe in Education (Part 1)

Appendix G – A Complete and Exact Copy of Keeping Children Safe in Education (Annex B)

Appendix H – Receipt of Safeguarding (Child Protection) Policy for a member of staff

This policy has been drawn up with regard to:

- Keeping Children Safe in Education (September 2021) (KCSIE)
- Non-statutory interim supplement to KCSIE: Safeguarding and remote education during coronavirus (COVID-19)
- Government guidance relating to COVID-19
- Disqualification under the Childcare Act (September 2018), which is incorporated into KCSIE
- Non-statutory advice for practitioners, What to do if you are worried a child is being abused (March 2015) and When to call the police, non-statutory guidance from the National Police Chiefs' Council, referred to in KCSIE
- Working Together to Safeguard Children (September 2018 – last update Dec 2020). (WT)
- Non-statutory advice, Information Sharing (2018), referred to in WT.
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019, updated September 2021)
- Prevent Duty Guidance: for England and Wales (July 2015, Revised 2021)
- The Prevent Duty: Departmental advice for schools and child care providers (June 2015)
- The use of social media for on-line radicalisation (July 2015)
- Statutory Framework for the Early Years Foundation Stage (September 2021)
- Information and advice provided by the Herefordshire Safeguarding Children Partnership (HSCP), and more recently by [the Safeguarding Children and Young People in Herefordshire arrangements](#) (published in June 2019).
- Sexual Violence and Sexual Harassment between children in schools and colleges (DfE September 2021)
- ISI Commentary of the Regulatory Requirements (September 2021)
- Recommendations made by Herefordshire Council's Quality Assurance of the School's Self-Assessment of Safeguarding Practice, June 2019.

➤ **Section 1: Introduction**

The School is committed to providing a safe and secure environment for children, staff and visitors and to promoting a climate where children and adults feel confident about sharing any concerns which they might have about their own safety or the well-being of others.

The School recognises that safeguarding instances can happen anywhere and all staff should be alert to possible concerns being raised in this school.

The School recognises that well-developed self-esteem, confidence, supportive friends and good lines of communication with a trusted adult can help with the prevention of abuse.

The School also recognises that children who are abused or who witness abuse may find it difficult to develop a sense of self-worth and to view the world in a positive way. The School seeks to be a stable, secure and predictable element in the lives of all pupils, and this will be particularly important for children at risk.

The School endeavours to support pupils through:

1. Curriculum - including PSHE: safeguarding can be interwoven with many aspects of the existing curriculum which can help to promote the pupils' understanding of relationships, to increase self-esteem and awareness, to make judgements and problem-solve, to be assertive, to recognise, accept and express feelings, to explore the nature of trust, to take decisions and accept responsibility for oneself and others, and to be self-reliant and independent;
2. an ethos, which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued; pupils are encouraged to talk and are listened to;
3. the implementation of school behaviour management policies;
4. a commitment to develop productive, supportive relationships with parents, whenever it is in the pupil's interests to do so;
5. ensuring that the pupils are aware that they can approach any member of staff about any issue, including their Form Tutor, Head of House, the School Nurses/Matrons, the Chaplain or Deputy Head;
6. the development and support of a responsive and knowledgeable staff group trained to respond appropriately in child protection situations.

Section 2a: Policy and procedures for dealing with concerns about a child

This section was written in accordance with Herefordshire Safeguarding Children Partnership's agreed inter-agency procedures. That said, we are aware that safeguarding arrangements in Herefordshire are now the responsibility of the Council, the Clinical Commissioning Group and the Police (more details here <https://herefordshiresafeguardingboards.org.uk/>).

This section applies in the case of suspected abuse of a child by another child or children (inside or outside of school), or by an adult outside of school. (In the case of child on child abuse both the victim and perpetrator(s) should be treated as being at risk.) This also includes the act of sexting which threatens the social, emotional and/or physical safety of the child and such behaviour will usually be reported to the Police, and may include verbal bullying (which should not be passed off as "banter", "just having a laugh" or "part of growing up"), and other relevant issues covered in KCSIE. Verbal bullying (or banter) or any other issue of pupil behaviour or bullying should be treated as a child protection issue if there is reasonable cause to suspect a child is suffering, or is likely to suffer, significant harm. (Further advice about sexting in schools is available from the UK Council for Child Internet Safety: [Sexting in schools and colleges](#).) Should there be a concern about the mental health of a pupil, this can be raised through the standard pastoral channels or by referral to the DSL.

It does not apply in cases which also involve an allegation of abuse against a staff member. This is covered in section 3 of this policy.

Guidance to staff on how to act when receiving a disclosure is contained in Appendix C.

The process below (A to C) details what action should be taken and who should take it when there are concerns about a child at Hereford Cathedral School, including Hereford Cathedral Junior School and the Early Years Foundation Stage. This process is also appropriate if there are concerns about children who may be at risk of being drawn into terrorism.

A. Sharing/recording concerns

An individual with concerns about a child (see Appendix B for signs and forms of abuse) must share these with the Designated Safeguarding Lead (DSL) who records them.

B. Consideration

The DSL considers if a referral to MASH (Multi Agency Safeguarding Hub) is necessary. In making this decision, the DSL may take account of the instinct of the referring adult and the definitions and signs of abuse (see Appendix B). In cases of doubt, the DSL will contact MASH for advice.

C. Either **Referral to MASH** or **No Referral to MASH**

Referral to MASH: The DSL makes a referral to MASH and liaises with them over future action.

No referral to MASH: The DSL records the concern and the reasons for the decision not to refer. The DSL oversees future care of the child(ren). This may involve putting internal systems into place or, where a child and family would benefit from coordinated support

from more than one agency (e.g. education, health, housing, police), there should be an inter-agency assessment to identify what help the child and family require to prevent needs escalating. An Early Help Assessment (more details: [here](#)) or a “Team around the Child” (TAC) approach may be appropriate. Should the individual with concerns about the child disagree with the decision not to refer, they are urged to refer the matter themselves (see contact details – appendix A).

Some Guiding Principles to adhere to throughout the A-C process:

- At all times, the school should consider what is in the best interests of the child.
- If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to MASH and/or the Police
- If at any time, the child’s situation does not appear to be improving, any of the adults involved should press for re-consideration – be it by the DSL or MASH.
- It is important to note that **anybody** can make a referral to social services. However, the DSL should be informed of such a referral.
- It is important that high thresholds are not imposed when making a referral decision. Herefordshire continuum of need can be found within [Safeguarding Children and Young People in Herefordshire \(2019-2020\)](#)
- Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, consent of parents or pupils is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.
- The importance of the following should be borne in mind:
 - children receiving the right help at the right time to address risks and prevent issues escalating
 - acting on and referring the early signs of abuse and neglect, and radicalisation
 - keeping clear records
 - listening to views of the child
 - reassessing concerns when situations do not improve
 - sharing information quickly
 - challenging inaction

Additional Notes Concerning peer on peer abuse

Allegations of peer on peer abuse should be recorded, investigated and dealt with in line with the A-C process above. Staff should be aware of the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but all peer on peer abuse is unacceptable and will be taken seriously. Peer on peer abuse can take different forms: bullying, online bullying, sexual violence, sexual harassment, physical abuse, up-skirting, sexting (youth-produced sexual imagery), initiation/ hazing type violence and rituals. Staff should be aware of the School’s procedures to minimise the risk of peer on peer abuse (in the behaviour and supervision policies) and of the School’s processes as to how victims, perpetrators and any other child affected by peer on peer abuse will be supported (behaviour policies). The Brook Traffic Light tool can be found here:

https://legacy.brook.org.uk/brook_tools/traffic/Brook_Traffic_Light_Tool.pdf

All staff should understand the importance of challenging inappropriate behaviours between peers. Even if there are no reports of peer on peer abuse, staff should understand that this does not mean it is not happening.

Additional Notes Concerning Children who run away or go missing

Both the Junior School and Senior School have a separate procedure concerning this. See the relevant Lost or Missing Child Policy. See Appendix G (KCSIE Annex A) for further information regarding a child missing from education.

Additional notes concerning Female Genital Mutilation

From October 2015, it is mandatory for teachers to report to the police cases where they discover that an act of FGM appears to have been carried out. Having made the report, the matter should then be discussed with the DSL (unless there is a good reason not to do this). The DSL will then continue the police liaison and involve MASH as appropriate. Further information can be found in the Government publication, "Multi-agency statutory guidance on female genital mutilation (April 2016)", which can be found here:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation> . Additional information regarding the mandatory reporting duty can be found in 'Mandatory reporting of female genital mutilation: procedural information' (Home Office publication) which can be found here:

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

In addition, the Home Office provides free e-learning at <https://www.fgmelearning.co.uk> . See Appendix G (KCSIE Annex A) for further information regarding so-called 'honour based' violence, including FGM.

Additional Notes concerning Radicalisation

Should any pupil be identified as being at risk of radicalisation, staff should report to the DSL. The DSL will follow steps B and C (above) as appropriate, including considering a referral to Channel.

On-line training in Prevent is available from

<https://www.elearning.prevent.homeoffice.gov.uk> .

See Appendix G (KCSIE Annex A) for further information regarding preventing radicalisation.

Additional Notes concerning Child Sexual Exploitation (CSE)

CSE may involve physical contact as well as non-physical contact such as encouraging children to behave in sexually inappropriate ways. Should any pupil be identified as being at risk of Child Sexual Exploitation, staff should report to the DSL. The DSL will follow steps B and C (above) as appropriate, including considering a referral directly to the police's child protection department (see contact details – Appendix A). Appendix G (KCSIE Annex A) for further information regarding child sexual exploitation. In addition, further information can be found in the DfE publication, "What to do if you suspect a child is being sexually exploited", available here: <https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited> which should be read in conjunction with the DfE publication Child Sexual Exploitation (February 2017), available here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf . The Child Sexual Exploitation Disruption Toolkit can be found here: <https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit>.

MASH has a specialist Child Sexual Exploitation Co-ordinator.

Additional Notes concerning Child Criminal Exploitation (CCE)

Forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, and shoplifting. Experiences of girls who are criminally exploited can be very different to those of boys, and the indicators may not be the same.

Section 2b: Advice on how to behave when in receipt of a disclosure

Staff should be aware that a child is likely to disclose to someone they trust: this could be anyone. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.

Staff should:

1. If possible, manage the disclosure with a second member of staff present.
2. Listen with care, quietly but actively; allow silence
3. Reassure the child that he/she will be taken seriously, is not to blame and was right to tell you
4. Reassure the child that they will be supported and kept safe
5. Not show disbelief
6. Not appear shocked or angry
7. Not give a guarantee of confidentiality
8. Take the allegation seriously
9. Affirm the child's feelings as expressed (don't tell the child how he/she should feel)
10. Avoid being judgmental about the information given by the child
11. Avoid a 'whodunit' approach (a casual enquiry about who did it is all right, but do not pursue the matter; remember, it can be distressing for children to be faced with persistent questioning)
12. Share the information only with those people who are necessary to progress it: refer to the DSL as soon as is practically possible
13. Respect the confidentiality of the information that you have shared.
14. Make a record. Best practice is to devote full attention to the child and to listen during the disclosure and to write up a thorough summary immediately afterwards. Notes should only record the facts as the child presented them.
15. Where the disclosure includes an online element, staff must not view or forward illegal images of a child; the advice of the DSL must be sought. The DfE have published guidance on [Searching, Screening and Confiscation](#) and the [UKCIS sexting advice](#).

Whilst the primary function of School staff is to listen and record, some questioning may be appropriate. However, the child should not be interrogated. Any questions should aim to obtain basic information. If the child does not respond, the matter should not be pursued further. The pursuit and recovery of evidence is a matter for the police. Where questions are asked, 'open-ended' questions (where, when, what etc) should be used rather than 'leading' questions which suggest possible answers.

NEVER think abuse is impossible in your school or that an accusation against someone you know well and trust is bound to be wrong. **LOOK AFTER YOURSELF** as you may feel upset after speaking to the child. You may need support and may wish to seek specialist support or counselling.

Section 3: Arrangements for handling low-level concerns and allegations of abuse against members of staff (including the Head and DSL), supply staff, volunteers and contractors.

This section is based upon KSCIE (September 2021) Part four, which should be consulted for further detail or clarification.

Overriding Principles:

- If there is a concern or an allegation pertaining to anyone working with children, all unnecessary delays should be eradicated
- No investigation should be undertaken without prior consultation with the local authority designated officer (LADO), or in the most serious cases, the police, so as not to jeopardise statutory investigations

Reporting lines for any safeguarding concerns or allegations about staff members (including the Head and DSL), supply staff, volunteers, contractors are as follows:

Hereford Cathedral (Junior & EYFS) School

All safeguarding concerns and allegations are to be reported straight away to the Head of the Junior School (who will liaise with the designated Governor for Safeguarding), or in his absence the Chairman of Governors (who will liaise with the designated Governor for Safeguarding). The Head of Senior School will be kept informed.

If there is conflict of interest in reporting the matter to the Head of the Junior School, the matter should be reported directly to the LADO.

If the concern or allegation pertains to the Head of the Junior School, the member of staff should inform the Chair of Governors (or, where the Chair cannot be contacted, the designated Governor for Safeguarding without notifying the Head of the Junior School). The Chair of Governors will keep the Head of the Senior School informed.

In borderline cases, discussions with the LADO can be held informally and without naming the school or individual.

Hereford Cathedral (Senior) School

Reporting Allegations:

All safeguarding concerns and allegations are to be reported straight away to the Headmaster (who will liaise with the designated Governor for Safeguarding), or in his absence the Chairman of Governors (who will liaise with the designated Governor for Safeguarding).

If there is conflict of interest in reporting the matter to the Headmaster, the matter should be reported directly to the LADO.

If the concern or allegation pertains to the Headmaster, the member of staff should inform the Chair of Governors (or, where the Chair cannot be contacted, the designated Governor for Safeguarding) without notifying the Headmaster.

In borderline cases, discussions with the LADO can be held informally and without naming the school or individual.

Next Steps to be taken by the Head of the Junior School, or the Headmaster, or the Chair of Governors (“the case manager”)

Allegations which may meet the harms threshold

These are allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This will be the case if it is alleged that anyone working in the school 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
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour outside of school).

If the allegation meets the harms threshold*, the actions in Appendix D should be followed.

*If in doubt, the LADO should be consulted.

Allegations which do not meet the harms threshold:

If the above does not apply then:

- this decision and its justification should be documented
- the concern should be classified as a low-level concern and the actions in Appendix E should be followed.

Section 4: Staff code of conduct – guidelines aimed at preventing pupils and staff being at risk of harm or at risk of allegations of causing harm

1. Staff are expected to maintain professional and supportive relationships with the pupils.
2. All staff, especially those engaged in close one-to-one teaching, should exercise caution when you are alone with pupils, whilst respecting privacy and confidentiality. If possible, when it is appropriate to work one to one make sure that others are within earshot, preferably within sight. This may be achieved by propping a door open, for example.
3. Be alert to the possible risks that might arise from social contact with pupils outside of the school.
4. If you feel that a student is becoming dependent upon you, or is making excessive or inappropriate demands on you, do not let the situation continue. Withdraw from the situation and seek advice from a senior colleague **without delay**.
5. Similarly, if you notice one of your colleagues at risk, you may raise this with him or her and/ or with the DSL.
6. If you feel uncomfortable or unsure of yourself in dealing with a student, withdraw from the situation and share your concerns with a senior colleague.
7. E-mail contact with pupils - staff should use their school email addresses for any email contact with pupils. Staff should ensure that any emails are professional and formal in style and manner.
8. Staff must not communicate with pupils through non-school social networking sites – nor allow pupils at school to become “friends” on non-school social networking sites, excepting their own children. Staff should exercise caution when using social networking sites and ensure that privacy settings specify friends only access.
9. Physical Contact - some physical contact is appropriate and necessary for the purpose of:
 - Care
 - Instruction
 - Restraint

The nature of the contact should be limited to what is age appropriate for the child and in public view. Staff should be aware that any such contact may be misconstrued. All Junior School and EYFS staff need to be aware of our Intimate Care Policy.

For our youngest children (EYFS), supportive physical contact is central to promoting emotional development, and at times, children will need to be held and offered physical reassurance.

10. Use of mobile phones and cameras – Hereford Cathedral School has a personal mobile device and camera policy, of which staff must be aware. This policy includes the EYFS. See Appendix C
11. Under no circumstances should any member of staff have a sexual relationship with a Hereford Cathedral School pupil.
12. The school's whistleblowing procedures are detailed in Section 5 of this document.
13. All members of staff are required to report low-level concerns and allegations of abuse against members of staff (including the Head and DSL), supply staff, volunteers and contractors in line with section 3 of this policy.

Section 5: Whistleblowing procedures

We all have a responsibility to help detect, prevent and report instances of any suspicious activity or wrongdoing, including bribery. Hereford Cathedral School is absolutely committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. Staff must acknowledge their individual responsibility to bring matters of concern to the attention of the Senior Leadership Team and/or relevant agencies. Although this can be difficult this is particularly important where the welfare of children may be at risk.

You may be the first to recognise that something is wrong but may not feel able to express your concerns out of a feeling that this would be disloyal to colleagues or you may fear harassment or victimisation. These feelings, however natural, must never result in a child continuing to be unnecessarily at risk. Remember it is often the most vulnerable children who are targeted. These children need someone like you to safeguard their welfare. **Don't think what if I'm wrong - think what if I'm right.**

Reasons for whistle blowing:

1. Each individual has a responsibility for raising concerns about unacceptable practice or behaviour
2. To prevent the problem worsening or widening
3. To protect or reduce risks to others
4. To prevent becoming implicated yourself

What stops people from whistle blowing:

1. Fear of starting a chain of events which spirals out of control
2. Disrupting the work or project
3. Fear of getting it wrong
4. Fear of repercussions or damaging careers
5. Fear of not being believed

How to raise a concern:

1. You should voice your concerns, suspicions or uneasiness as soon as you feel you can. The earlier a concern is expressed the easier and sooner action can be taken. Try to pinpoint exactly what practice is concerning you and why.
2. Approach your immediate manager, DSL, or the Head.
3. If your concern is about your immediate manager/Head, speak to the Chair of Governors or to the Headmaster of the Senior School, or the Governor who takes a specific interest in safeguarding issues.
4. Make sure you get a satisfactory response - don't let matters rest.
5. Ideally, you should put your concerns in writing, outlining the background and history, giving names, dates and places wherever you can.
6. A member of staff is not expected to prove the truth of an allegation but will need to demonstrate sufficient grounds for the concern. (This includes any adult, paid or voluntary, who works in our school.)

What happens next:

1. You should be given information on the nature and progress of any enquiries.

2. Your employer has a responsibility to protect you from harassment or victimisation.
3. No action will be taken against you if the concern proves to be unfounded and was raised in good faith.
4. Malicious allegations may be considered as a disciplinary offence.

If mediation or dispute resolution is required, this will be provided.

Self-reporting

There may be occasions where a member of staff has a personal difficulty, perhaps a physical or mental health problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Further advice and support:

It is recognised that whistle blowing can be difficult and stressful. Advice and support is available from any member of the Senior Leadership Team. In addition advice and support is available via the NSPCC Whistle Blowing Helpline: 0800 028 0285 (0800-200 Monday-Friday, or email help@nspcc.org.uk).

Section 6: Recruitment procedures

An important part of safeguarding children is for schools to operate safe recruitment procedures and to follow procedures for appointing staff. The Headmaster of the Senior School, the Head of the Junior School and other staff have undertaken HSCB's Safe Recruitment training.

The School will only use employment agencies which can demonstrate that they positively vet their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the LA. Staff joining the School on a permanent or temporary basis will be given a copy of this safeguarding policy.

The School's full recruitment procedures can be found in the School's Recruitment Policy. Parents can access this policy by contacting the School.

An additional note on visiting speakers

Before a visit takes place, the Deputy Head of the Junior School or Senior School must be consulted and give consent. He will ensure that appropriate checks have taken place to ensure that the speaker is suitable.

Section 7: Management of safeguarding – Identities, Roles and Responsibilities

Role of Governors (and the role and identity of the Safeguarding Governor)

The Governing Body is responsible for ensuring there is an effective safeguarding/child protection policy in place, and for ensuring that the arrangements described in the policy are implemented fully in practice. Charity Commission guidance on charity and trustee duties to safeguard children is available here: <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

Whilst the Governing Body recognises that safeguarding duties are the responsibility of the Governing Body as a whole, **Will Hanks** is the appointed Safeguarding Governor.

The Safeguarding Governor will liaise with the Headmaster, the Head of the Junior School and DSL(s) to ensure that the policy, procedures and efficiency with which the related duties have been discharged are reviewed annually by Governors. He will ensure that the DSLs receive the necessary training in Safeguarding and Child Protection and inter-agency working and that this is updated every two years. He will also report to the Governing Body and ensure that they undertake an annual review of the policies and procedures and of the efficiency with which related duties have been discharged.

Role of the Headmaster

The Headmaster, in liaison with the Head of the Junior School (with regard to the Junior School), is responsible for the implementation of the policy across the whole school and ensuring that the outcomes are monitored. He will ensure that reports are made at least annually to Governors about the working of the policy.

Identity of the DSLs and DDSLs

Hereford Cathedral (Junior & EYFS) School

The **Designated Safeguarding Lead (DSL) for the Junior School (including EYFS)** is: **James Debenham (Deputy Head)** who has also designated responsibility for EYFS and liaising with local statutory children's agencies as appropriate.

j.debenham@herefordcs.com or 01432 363511

The DSL has ultimate lead responsibility for safeguarding and child protection in the Junior School.

The **Deputy Designated Safeguarding Lead (DDSL) for the Junior School (including EYFS)** is:

Tracey Denny

t.denny@herefordcs.com or 01432 363511

To ensure that there is always cover for this role, in the absence of both of the above, the Senior School DSL or DDSL may be contacted. (See below for contact details)

In all instances, DSLs and DDSLs will keep Michael Gray (Headmaster of the Senior School) informed or in his absence, or if deemed inappropriate, Will Hanks (Safeguarding Governor).

Hereford Cathedral (Senior) School

The **Designated Safeguarding Lead (DSL) for the Senior School** is:

Bruce Blyth (Deputy Head)

b.blyth@herefordcs.com or 01432 363526

The DSL has ultimate lead responsibility for safeguarding and child protection in the Senior School.

The **Deputy Designated Safeguarding Leads (DDSL) for the Senior School** are:

Jo Beavan (j.beavan@herefordcs.com or 01432 363522) and **Nathalie Teale**

(n.teale@herefordcs.com or 01432 363522)

To ensure that there is always cover for this role, in the absence of both of the above, the Junior School DSL or DDSL may be contacted. (See above for contact details)

In all instances, DSLs and DDSLs will keep Michael Gray (Headmaster of the Senior School) informed or in his absence, or if deemed inappropriate, Will Hanks (Safeguarding Governor).

Role of the DSLs and DDSLs:

Whilst the DSLs have ultimate lead responsibility for safeguarding and child protection (including online safety), the DSLs and DDSLs work together on the following:

- To manage referrals (as described in Section 2 of this policy)
- To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- To ensure that all training is carried out in accordance with Section 8 of this policy
- Ensure each member of staff has access to and understands the School's safeguarding/child protection policy and procedures
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of the workings of the [Safeguarding Children and Young People in Herefordshire arrangements](#) and to contribute to these effectively.
- Be alert to the specific needs of children in need, those with special educational needs and young carers
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- To take the lead in matters of online safety, including the weekly monitoring of internet searches which have been blocked by the School's internet filters
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff
- Ensure this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this
- Ensure this policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- Link with the local agencies to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the School, ensure their child protection file is copied for any new school or college as soon as possible but transferred separately from the main pupil file; additionally, to ensure that the appropriate information is shared in order to ensure that the new school is able to have support in place when the child arrives at the new school.

With reference to radicalisation, Bruce Blyth is the designated 'Prevent Lead'. With reference to Looked After Children, Bruce Blyth is the designated teacher.

Role of all staff, volunteers and Governors

All staff, volunteers and Governors have a role to play in safeguarding the children. They have a duty to be alert to signs of abuse and to share concerns as detailed in Section 2 of this policy.

Section 8: Training

All staff are required to read this policy, Part One of KCSIE and Annex A of KCSIE which is included as an appendix to this policy.

On appointment, all staff receive a safeguarding briefing and are issued with a copy of this policy, which includes information about the role of the designated safeguarding leads and deputy designated safeguarding leads (Section 7), the integral staff code of conduct (Section 4), whistle blowing procedures (Section 5), the identity of the DSLs and DDSLs (Section 7) and part 1 and Annex A of KCSIE (Appendices C & D). They are also issued with a copy of the relevant behaviour policy and lost or missing child policy (Junior School or Senior School). During this briefing, all of the above are talked through as well as our online safety procedures, which include the use of filters for all internet access. Staff are given the opportunity to ask questions and discuss all the above, as well as the school's own safeguarding policy and procedures, and the school's procedures for reporting low-level concerns.

DSLs receive updated safeguarding / child protection training every two years. This training is of the appropriate level, and includes local inter-agency working protocols and the local approach to Prevent duties. They also receive informal updates. In addition, the 'prevent lead' (Bruce Blyth) will maintain up to date training in Prevent.

All staff are required to undertake safeguarding training every three years (at a minimum), in line with local recommendations. This is delivered through any of the following:

- Internal briefings
- Internal training organised with an external trainer
- Online training (Educare Tes Develop)

All staff safeguarding training is recorded by the Human Resources Office. The DSLs audit this training record regularly.

In addition to the at least three yearly training outlined above, staff also receive reminders and informal updates of the school's safeguarding policy and procedures. These might be via email and / or during staff meetings. These reminders and informal updates occur at least annually.

The Governing Body recognises that staff build up expertise by undertaking safeguarding training and managing safeguarding concerns on a day-to-day basis. Staff are therefore provided with the opportunity to contribute to and shape safeguarding arrangements and child protection policy. This is achieved through regular dialogue between Governors and key members of staff.

Section 9: Arrangements for reviewing the School's safeguarding/child protection policies and procedures annually

The Governing Body review this policy and its implementation annually.

The DSLs and the Safeguarding Governor liaise over this process. They review the policy and its implementation, by considering issues such as:

- training records
- evidence of appropriate liaison with other agencies
- developments in local and national safeguarding procedures and practice
- the implementation of policy with regard to specific cases
- issues and themes which may have emerged in school

Additionally, if there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

Section 10: Arrangements to fulfil other safeguarding and welfare responsibilities

- The school is aware of its duty to promote the safety and welfare of its pupils. It does this through provision of safeguarding in the curriculum (within PSHE, e-safety sessions in ICT, and assemblies) and the provision of internet safety sessions for parents.
- The School has in place certain measures to ensure and promote internet safety. These include the use of internet filtering (for both hard wired and wifi connected devices) and monitoring of results throughout the whole school. In addition, Junior School are always supervised when online. Within lessons in the Senior School, software can be used to monitor the pupils' computer use. (See also Role of DSL – section 7).
- The school is aware of its context. We are a city centre school, with pupils aged rising 3-18, from a wide range of backgrounds, distributed across a number of different buildings. Our catchment includes rural area of Herefordshire, including agricultural communities. Regionally, Hereford is located between major cities, such as Birmingham and Cardiff, and therefore County Lines may be relevant. International students join us from a wide range of different countries and cultures. Further details of the local context of Herefordshire are contained in [Safeguarding Children and Young People in Herefordshire](#)
- The DSL has responsibility for the welfare and progress of any looked after children on roll.
- Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and can be particularly vulnerable to abuse, including to peer on peer abuse. We recognise that additional barriers can exist when recognising abuse and neglect in this group of children. These additional barriers can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
 - communication barriers and difficulties in overcoming these barriers.

It is incumbent on members of staff and the DSL to bear this in mind when considering how to support such children, and the relevant Head of Learning Support may be involved in this decision-making process.

- Care of the Choristers - we recognise that the choristers have additional responsibilities, commitments and pressures. The Cathedral's Safeguarding Policy can be found via a link here: <https://www.herefordcathedral.org/safeguarding>. Contact details for Cathedral Safeguarding personnel can be found in the contacts section of this policy. There are additional measures in place to ensure their welfare:

- Junior School: a weekly meeting between Head of the Junior School and Chorister Tutor, a weekly meeting between the Head, Chorister Tutor and Deputy Head, with a pastoral and an organisational focus; termly Cathedral Liaison Meetings; regular meetings between the Head of the Junior School and the choristers themselves
 - Senior School: all choristers are added to the Care List and discussed regularly; relevant tutors liaise with the Chorister Tutor as necessary; termly Cathedral Liaison Meetings; the Chorister Tutor attends the weekly staff briefing
- Disqualification Under the ChildCare Act 2006 - the School is aware that it must not knowingly employ people to work in 'childcare' or allow them to be directly concerned in its management if they are 'disqualified' from childcare. Within the context of the Junior School, childcare includes all provision for children in Nursery and Reception and Breakfast Club and Phoenix Club.

The guidance applies to employees, volunteers, supply / agency staff, self-employed people, staff and other organisations, governors who volunteer and all of those directly concerned in the management of the above. It does not apply to some groups such as cleaners, kitchen staff and school nurses. Further details of those included and not included and on the ground for disqualification can be found in the document Disqualification under the Child Care Act (2006) June 2016.

It is the School's policy to:

- inform the relevant people of the legislation;
- gather sufficient and accurate information (through a self-declaration form) about whether or not any relevant person is disqualified;
- record the checks for those relevant persons, including the date disqualification checks were completed.

Further details, and the steps which must be taken if a relevant person is found to be disqualified, or if there is any doubt over the issue, can be found in the document [Disqualification under the Child Care Act \(2006\) Updated 31 August 2018.](#)

- Boarding. The school is aware of its obligations under the National Minimum Standards for Boarding, which can be found [here](#). These apply to boarding pupils and also to those for whom the school has organised lodgings. Contact details for relevant staff members can be found in Appendix A.

Addendum (COVID-19) for use in the event of a partial or whole school closure

Context and Introduction

This addendum applies in the event of a partial or whole school closure.

The School will fulfil its responsibilities toward all pupils, including those who are vulnerable, and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

All the school policies – including the Behaviour and Sanctions Policy, Anti-bullying Policy and the Safeguarding Policy (including the Staff Code of Conduct and reporting lines) - will still apply unless specifically mentioned below.

Staff will be reminded about the current arrangements for safeguarding during staff meetings and / or via email. Reminders about the need to report any concerns without delay will also be provided. Reporting lines remain the same.

The School will continue to be a safe space for all children to attend and flourish. The Headmaster will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety. Any Government guidance for education and childcare settings will be followed, as will advice from other relevant bodies.

Any required safeguarding training will continue to take place remotely, including via the online platform Educare.

Additional Notes for Teachers of Pupils from Nursery to Year 6

When interacting with pupils from home, via email, Firefly or Zoom:

- Teachers should use school accounts for all electronic communication with pupils
- All those participating must wear suitable clothing, as should anyone else in the household
- Any computers used should be in appropriate areas, for example, not in bedrooms; and where possible be against a neutral background
- We all need to be aware of what may be in view in the background, for instance photos of a beach holiday, so that it does not intrude on family privacy
- Language must be professional and appropriate, including any family members in the background
- Parents must remain in control of electronic devices and remain within earshot when children are in contact with teachers
- Should any pupil behave inappropriately, they may not be allowed to take part in future Zoom sessions
- Meetings are only accessible to those with the ten-digit meeting ID number and password, which is provided by emailed link or by password protected page
- Teachers must ensure that their waiting rooms are enabled and that participants are muted on entry and not able to unmute themselves or share their screens until their identity is confirmed

We will follow the Children's Commissioner advice regarding Zoom use, a previous version of which can be found here:
(<https://www.childrenscommissioner.gov.uk/coronavirus/keeping-classrooms-safe-online/>).

Additional Notes for Teachers of Pupils from Year 7 to Year 13

The Behaviour Policy & Code of Conduct for Remote Learning (Pupils) will be shared and discussed with all pupils (via Tutors) at the time of any partial school closure. This policy and code of conduct is also published in the Remote Learning Plan for staff, parents and pupils.

Further to this, and the policies mentioned at top of this document, the School Rules and the advice document Being Safe, Being Secure, Being Responsible are also important in keeping all pupils safe.

Key principles (for remote learning to ensure safe learning for all pupils):

- Every pupil must behave online with the same expectations of behaviour when interacting face-to-face with others; without exception, treat all others with respect
- Firefly, Microsoft Email and Microsoft Teams all operate within the School IT Systems and are monitored (as would be the case in any school or business)
- The sole purpose of Microsoft Teams (which is new to our community) is to educate all pupils of the School remotely; no 'social' interaction must take place other than for educational and school community purposes

Specific safeguarding principles for remote learning for pupils:

- Technology should be used in appropriate areas of the family house; if you use your bedroom as a workspace, then you should have your bedroom door open
- Only teachers will initiate video conferencing; such will be used to enhance teaching
- When using video, pupils must wear appropriate clothing; backgrounds which can be blurred, must also be appropriate
- Any video conferencing or voice conferencing will be recorded and stored securely
- Do not share personal information, such as passwords or sensitive data about yourself
- At the end of any conference call (video or audio), you must leave the meeting on the instruction of the teacher; teachers will record video and audio conferences
- Only Sixth Form pupils will be permitted to contact their peers on Teams for educational purposes only

The following statement will be published for pupils:

If you are worried about any aspect of remote learning, contact your Form Tutor, your Head of House or the Designated Safeguarding Leads, Mr Blyth or Mrs Pattison

Specific safeguarding principles for remote learning for staff:

Teachers should use school accounts for all electronic communication with pupils.

Video-conferencing guidelines

- Our communication through Teams must be as professional as that which would be the norm in our classrooms

- Only we as teachers will initiate video conferencing with pupils
- Please wear appropriate/professional clothing, and conduct any video conferencing from a suitable location in your home, with a suitable background (which can be blurred and there is a new select background option – both only available on the app, not browser)
- Please ensure that you record any live video conferencing through Teams
- Any material on Teams, be it files, messages or videos must only be shared within the HCS pupil community for the purpose of learning
- Please limit all video conferencing to within school hours (see below)
- At the end of any class video conference, ensure that all pupils leave the call first, before you do

1-1 Video conferencing

- Tutors will be 'meeting' with tutees for Registration and small group meetings; 1-1 meetings will be rare. If such is required, please ensure that any 1-1 video call takes place at a time that has been scheduled in advance, make the Deputy Head aware so that the reason for the Teams call can be logged beforehand. The call must be recorded.
- If it is necessary to arrange a 1-1 video conference with a pupil outside of allocated times, please ensure that you have sought the consent of the pupil's parents in advance

All staff will be instructed to read the ICT (& Email) Acceptable Usage Policy at the point of any school closure.

Online safety

Online safety is of high priority during remote learning. The School's online filtering system continues to be utilized. Permissions for the use of Zoom and Microsoft Teams will be closely monitored.

Parents are provided with advice about online safety within the Remote Learning Plan.

Where children of key workers are using computers in school, appropriate supervision will be in place.

Peer-on-peer abuse

All staff must be particularly aware of potential peer-on-peer abuse that might take or has taken place online during remote learning. Any such concern should be reported to the DSLs.

Designated Safeguarding Leads (DSLs)

The same processes for contacting the DSLs remain in place. Contact details are published in the Remote Learning Plan for all staff, pupils and parents, as they also are in the School's Safeguarding Policy.

All DSLs and Deputy DSLs will manage safeguarding records remotely as necessary. The DSLs will maintain a list of pre-arranged 1-1 remote learning sessions which may be necessary due to A Level coursework tutorials, or specific support for individual pupils.

The DSLs will maintain regular contact with the Governor responsible for safeguarding via telephone and email.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

Use of Personal Devices and the storage of images and work on personal devices

During any period of school closure those measures contained in Appendix C which relate to the storage of images on personal devices do not apply.

We recognise that members of staff may need to use their personal devices and store images of pupils' work on these devices in order to effectively teach and support the children during this time.

Any images relating to pupils should be stored wherever possible in a specific location on the device. Once the school re-opens, we will issue instructions on the deletion of this content from personal devices.

Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans.

Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

All pupils known to be vulnerable or those who need considerable pastoral support are identified in a list. Those most vulnerable are allocated an adult (DSL or Head of House) so

that they are actively monitored throughout the remote learning period. The DSLs will maintain a list of these pupils.

Attendance

We will fulfil our obligations regarding attendance recording.

Attendance can be monitored in a number of ways: Form Tutor and Subject Teacher feedback to Heads of House and SLT, pupil self-registration on Firefly each morning and for all lessons, and information provided by parents and guardians.

Safer recruitment of new employees

It will remain essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the relevant safer recruitment processes will be followed, as appropriate, and as outlined in the relevant sections in part 3 of Keeping Children Safe in Education (2019) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity during the remote learning period. This includes visiting speakers who are invited for remote learning lessons.

Appendix A – Contacts

Contact details for DSLs can be found in Section 6 of this policy.

Head of International Students: Stuart Higgins: s.higgins@herefordcs.com

Housemistress: Pippa Fowler: p.fowler@herefordcs.com

Safeguarding Governor: Will Hanks and Chair of Governors: Rear Admiral Philip Wilcocks, via the Bursar: bursarpa@herefordcs.com 01432 363544

Headmaster of Senior School: Michael Gray: hmpa@herefordcs.com 01432 363521

Cathedral Contacts

Duncan Jones, a member of Chapter with Safeguarding oversight: 07703 276135 or duncan.jones@herefordcathedral.org

Lorraine Cave-Brown-Cave, HR and Safeguarding, is the office based staff member with responsibility for safeguarding: 01432 374254 or lorraine@herefordcathedral.org

Herefordshire Contacts

Herefordshire LADO:

lado@herefordshire.gcsx.gov.uk

01432 261739 or via 01432 260665

The Multi Agency Safeguarding Hub (MASH):

01432 260800

The Herefordshire Lead for the Channel programme is Nina Bridges, contactable via MASH.

The Herefordshire Lead for the CSE in Amy Proctor, contactable via MASH.

The Safeguarding Children and Young People in Herefordshire arrangements (which replace the Herefordshire Safeguarding Children Partnership) can be found here:

<https://herefordshiresafeguardingboards.org.uk/>

West Mercia Police Switchboard: 0300 333 3000 (request the duty inspector)

The Police's child protection department can be contacted via the West Mercia Police Switchboard, or by dialling 101.

The West Midlands's Safeguarding Policies and Procedures, including the guidance concerns how to manage professional disagreements can be found here:

<https://westmidlands.procedures.org.uk/>

For support and advice about extremism, the following contacts may be useful;

- the local police force (101)

the DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

Appendix B - SIGNS OF POSSIBLE CHILD ABUSE

Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (eg via the internet). They may be abused by an adult or adults or by another child or children. It is important for staff to identify signs of possible abuse and neglect, and serious violence, at the earliest opportunity. These may include:

1. significant changes in children's behaviour and / or a significant decline in performance;
2. deterioration in children's general well-being;
3. unexplained bruising, marks or signs of possible abuse or neglect;
4. absence from school;
5. children's comments which give cause for concern;
6. any reasons to suspect neglect or abuse outside the setting, for example in the child's home; and/or
7. inappropriate behaviour displayed by other members of staff, or any other person working with children, for example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

Lists such as the one below are neither completely definitive nor exhaustive. The information in such lists has to be used in the context of the child's whole situation and in combination with a range of other information related to the child and his/her circumstances. There can be an overlap between all the different forms of child abuse and all or several can co-exist.

Physical Abuse

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs of possible physical abuse:

1. Unexplained injuries or burns, particularly if they are recurrent
2. Improbable excuses given to explain injuries
3. Refusal to discuss injuries
4. Untreated injuries, or delay in reporting them
5. Admission of excessive physical punishment
6. Arms and legs kept covered in hot weather
7. Fear of returning home
8. Aggression towards others
9. Running away
10. Giving a child harmful substances, inappropriate drugs and alcohol
11. Withdrawal

12. Unexplained absences/lateness

When considering the possibility of non-accidental injury it is important to remember that the injuries may have occurred for other reasons, e.g. genuine accidents or medical disorders.

Neglect

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

Signs of possible physical neglect:

1. Constant hunger
2. Poor personal hygiene
3. Constant tiredness
4. Poor state of clothing
5. Frequent lateness and/or unexplained non-attendance at school
6. Untreated medical problems
7. Low self-esteem
8. Poor peer relationships
9. Stealing
10. Mental health problems

Non-Organic Failure to Thrive

Signs of possible non-organic failure to thrive:

1. Significant lack of growth
2. Weight loss
3. Hair loss
4. Poor skin or muscle tone
5. Circulatory disorders

Emotional Abuse

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve

seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs of possible emotional abuse:

1. Low self-esteem
2. Continual self-deprecation
3. Sudden speech disorder
4. Significant decline in concentration
5. Socio-emotional immaturity
6. 'Neurotic' behaviour (e.g. rocking, head banging)
7. Self-mutilation
8. Compulsive stealing
9. Extremes of passivity or aggression
10. Running away
11. Indiscriminate friendliness
12. Mental health problems

Sexual Abuse

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming 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.

Not all children are able to tell parents/adults that they have been assaulted. Changes in behaviour may be a signal that something has happened. These are general indicators that the child may be troubled, though not necessarily about a sexual assault. The child may have some of these problems or none at all. It is the combination, frequency and duration of signs that will alert you to a problem. Try to notice all changes in usual behaviour. It is important to remember that in sexual assault there may well be no physical or behavioural signs.

Signs of possible sexual abuse:

Behavioural

1. Lack of trust in adults or over familiarity with adults
2. Fear of a particular individual
3. Social isolation – withdrawal or introversion
4. Sleep disturbance (nightmares, irrational fears, bed wetting, fear of sleeping alone, needing a nightlight)
5. Running away from home
6. Girls taking over the mothering role
7. Reluctance or refusal to participate in physical activity or to change clothes for activities

8. Low self-esteem
9. Drug, alcohol or solvent abuse
10. Display of sexual knowledge beyond child's years
11. Unusual interest in the genitals of adults or children or animals
12. Expressing affection in inappropriate ways, e.g. 'French kissing'
13. Fear of bathrooms, showers, closed doors
14. Abnormal, sexualised drawing
15. Fear of medical examinations
16. Developmental regression
17. Poor peer relations
18. Over sexualised behaviour
19. Compulsive masturbation
20. Stealing
21. Psychosomatic factors, e.g. recurrent abdominal pain or headache
22. Sexual promiscuity
23. Physical/Medical
24. Sleeplessness, nightmares, fear of the dark
25. Bruises, scratches, bite marks to the thighs or genital areas
26. Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
27. Pain on passing urine or recurrent urinary infection
28. Stained underwear
29. Anxiety/depression
30. Eating disorder, e.g. anorexia nervosa, bulimia
31. Discomfort/difficulty in walking or sitting
32. Pregnancy – particularly when reluctant to name father
33. Venereal disease, sexually transmitted diseases
34. Soiling or wetting in children who have been trained
35. Self-mutilation/suicide attempts

Further signs of abuse and neglect can also be found on the Herefordshire Safeguarding Partnership's Website (<https://herefordshiresafeguardingboards.org.uk/hscb>)

Radicalisation

Key indicators of risk of radicalisation are:

1. Vulnerability: distance from cultural heritage; personal crisis; personal circumstances; unmet aspirations; criminality.
2. Access to extremism / extremist influences
3. Experiences, Behaviours and Influences: encountering rejection; evidence of extremist influences; international events having a personal impact; conflict with family over religious beliefs or life choices
4. Travel: a pattern of regular or extended travel within the UK; travel for extended periods of time to international locations associated with extremism; using methods to disguise true identity.
5. Social Factors: experience of poverty, disadvantage, discrimination or social exclusion; a lack of affinity or understanding of others or social isolation from peer group; a flawed understanding of religion or politics; insecure or absent family relationships; evidence that a significant adult had extremist views or sympathies.

6. Critical Risk Factors: being in contact with extremist recruiters; articulating support for extremist causes or leaders; accessing extremist websites, especially those with a social networking element; possessing extremist literature; using extremist narratives and a global ideology to explain personal disadvantage; justifying the use of violence to solve societal issues; joining extremist organisations; significant changes in appearance and / or behaviour.

Child Sexual Exploitation

Signs and indicators of child sexual exploitation include:

1. disengagement with school, not in school, truancy, exclusion
2. repeat sexually transmitted infections; in girls repeat pregnancy, abortions, miscarriage
3. hanging out with groups of older people, anti-social groups, other vulnerable peers
4. unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
5. involved in abusive relationships, intimidated and fearful of certain people or situations
6. self-harming, suicide attempts, overdosing, eating disorders
7. injuries from physical assault, physical restraint, sexual assault
8. moving around the country, appearing in new towns or cities, not knowing where they are
9. sexting (sending and receiving explicit photos of themselves on mobile phones)
10. unexplained gifts
11. unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
12. engagement in offending, criminal activity
13. going missing, running away, homelessness
14. drug use, alcohol abuse
15. sexually risky behaviour, 'swapping' sex
16. gang fights, gang membership
17. getting into/out of different cars
18. accessing hardcore pornography on the internet
19. contact with known perpetrators
20. association with older men
21. inappropriate sexual behaviour
22. seen at known places of concern
23. police involvement, police records

Further information regarding child sexual exploitation be found on the Herefordshire Safeguarding Partnership's Website (<https://herefordshiresafeguardingboards.org.uk/hscb/>)

Appendix C - Camera Policy and Policy for Acceptable Use of Personal Mobile Devices by School Employees

The policy defines and describes the acceptable use of personal mobile devices (eg 'phones) and cameras for school employees. Its purpose is to ensure the safety of the children in our care, in accordance with our Safeguarding procedures, and to protect staff from allegations of misconduct.

We recognise that mobile devices are an essential part of modern life and can be vital as an emergency contact for staff. We seek to ensure that everyone follows the same guidelines while at work and therefore to ensure that the safety of children, and professionalism of staff, is always maintained.

USE OF MOBILE PHONES & OTHER MOBILE DEVICES

- Personal mobile devices should be switched off or set to 'silent' during lessons.
- Staff should not use personal mobile devices in school during working hours when children are present, unless there are exceptional circumstances.
- It is permissible for staff to give the school telephone number as a point of emergency contact for them during the school day.
- For games, trips, walks etc., which are away from school, staff must take a mobile device in case there is a need for emergency calls. This should normally be a school phone but it may be a personal device, provided that its use is restricted to urgent school business or emergency calls.
- Staff must not give their personal mobile phone number to pupils (excepting their own children).
- Staff must not store children's numbers on their personal devices (excepting their own children).
- Staff must not contact a pupil via the pupil's mobile phone except in exceptional circumstances.

TAKING PHOTOGRAPHS OF CHILDREN

- Photographs taken of the children should only be taken with school cameras/devices. Photographs should only be stored on school computers and school photo albums.

[There may be reasons why a particular member of staff may need to deviate from the above. Any member of staff wishing to do so should seek prior written consent from the DSL in the first instance.

Consent may be granted by the DSL in consultation with the Head of the Junior School, or the Deputy Head of the Senior School for a stated purpose and within a given time frame, generally under the following conditions:

Conditions:

- The images should be stored separately from any other images.
 - The images should be used only for the prescribed purpose.
 - The photos should only be stored for as long as necessary and should then be deleted.]
-
- Neither personal details nor full names of children should be published alongside images on the school website, or in school publications.
 - A small number of parents have not given permission for their children's photos to be published. This information is available from the Marketing and Development Office and the Junior School Office. Staff must respect the decision of parents and ensure that they do not place any photos on the school website nor in any other publication without parental permission.
 - Staff should avoid taking pictures of children which show them in short skirts, swimming costumes, bikinis etc.
 - Staff are advised not to allow themselves to be photographed by a pupil with a camera or mobile phone.
 - Members of staff may take copies of any photographs which contain their own children from the school network for their own personal use. However, they should be sensitive to the fact that these photographs may contain other children. No photographs which contain other children should be placed on personal social media.

Appendix D: Managing Allegations which may meet the harms threshold

There are two consideration:

- the welfare of the child. If a child has been harmed or there may be immediate risk of harm to a child or if the situation is an emergency, the DSL should make a referral to MASH and as appropriate to the police. (See section 2 of this policy).
- investigating and supporting the person subject to the allegation

Investigating and supporting the person subject to the allegation

- the case manager will make basic enquiries, whilst being careful not to jeopardise any future police investigation. For example, it may be possible to establish: was the individual in school at the time of the allegation(s), was it possible for the individual to have been in contact with the child at that time; were there any witnesses. If there is any doubt as to the appropriateness of these investigations, the LADO should first be consulted.
- the case manager will then contact the LADO (see contact details) to agree next steps, which may include a strategy discussion involving outside agencies.
- the individual about whom the allegation has been made should not be informed without guidance from the LADO.

If the case manager is concerned about the welfare of other children or the member of staff's family, the DSL will be involved in discussions and the formulation of a risk assessment and a possible referral to MASH.

If initial discussion leads to no further action being taken, the case manager will:

- record the decision and the justification for it, and
- agree with the LADO what information should be put in writing to the individual concerned and by whom.

If further enquires are required, the case manager and the LADO will discuss and agree next steps.

Throughout the investigation, the case manager will monitor the progress of the case ensuring that it is being dealt with as quickly as possible and thoroughly and fairly. Reviews will be conducted at least fortnightly or monthly, according to a pre-determined schedule, depending on the complexity of the case.

The LADO will provide guidance throughout.

Allegations against supply teachers and contracted staff: the school is required to ensure that any allegations are dealt with properly, fully involving any relevant agency. A discussion will be held with the agency concerning whether it is appropriate for the individual to continue to work in other schools.

Allegations against Governors: the school's procedures will be followed in full in the case of an allegation made against a governor.

Suspension

The case manager will consider carefully whether the circumstances warrant suspension from contact with children at the school, if only until the allegation is resolved. Suspension will be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or when the case is so serious that it might be grounds for dismissal. If in doubt, the case manager will seek views from the LADO, as well as the police and MASH if they have been involved.

Further details about suspension and possible alternatives can be found in KCSIE part 4.

If immediate suspension is considered necessary, the case manager will record the rationale and justification for this course of action, including what alternatives were considered.

Duty of care.

The case manager will consider the school's duty of care to

- the child
 - the member of staff
-
- the case manager will manage and minimise the stress caused by the allegation;
 - the case manager will inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
 - the case manager will advise the individual to contact their trade union representative, or a colleague for support;
 - the case manager will appoint a named representative to keep the person informed about progress of the case;
 - the case manager will provide access to counselling or medical advice where appropriate.; and

- the case manager will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.
 - the parents of the child involved. They will be:
 - formally told about the allegation as soon as possible. The case manager will consult the LADO and where involved, children's social care and/or the police on what information can be disclosed;
 - kept informed about the progress of the case, only in relation to their child - no information will be shared regarding the staff member; and
 - made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002 (see paragraphs 372-380).

Information Sharing

All relevant information about the member of staff and the alleged victim should be shared between the agencies involved.

All agencies involved (for example the Police or MASH) will be asked to obtain consent from any individuals involved to share their statements and evidence with the school for use in any disciplinary process.

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. We are aware that it is an offence (except in very limited circumstances), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

Reporting restrictions apply until:

- the point that the accused person is charged with a relevant offence; or
- the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.

The case manager will take advice from the LADO, police and children's social care to agree the following:

- who needs to know and exactly what information can be shared;

- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and,
- how to manage press interest if, and when, it should arise.

Allegation outcomes

The outcome of the of an allegation will be:

- *Substantiated*: there is sufficient evidence to prove the allegation;
- *Malicious*: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- *False*: there is sufficient evidence to disprove the allegation;
- *Unsubstantiated*: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- *Unfounded*: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If the allegation is *substantiated* and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- the employer ceases to use the person's services*.

The school will discharge its legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

(There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.)

* Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.

In addition, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/700607/Teacher_misconduct-the_prohibition_of_teachers.pdf

. Further guidance can be found on the TRA website:

<https://www.gov.uk/government/organisations/teaching-regulation-agency>

Unsubstantiated, unfounded, false or malicious allegations

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

The designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per the school's behaviour policy.

Returning to work

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate that. Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience.

Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school.

Managing the situation and exit arrangements

Resignations and 'settlement agreements'

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children.

The school will not cease any investigations if the person leaves, resigns or ceases to provide their services. The school believes that it is important that every effort is

made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

Wherever possible, the accused will be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, will continue even if the accused does not cooperate.

Whilst it may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, an outcome will be reached and recorded wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome will be made clear when providing references to prospective employers.

It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances the school may use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Where a settlement/compromise agreement is used, this will not prevent the school from:

- fulfilling their legal duty to refer cases to the DBS where the referral criteria are met; or
- providing a reference to potential employers when requested; or
- considering whether to make a referral to the Teaching Regulations Agency where the criteria are met - see paragraph 333.

Record keeping

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, the following information will be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome as categorised above;

- a copy provided to the person concerned, where agreed by children's social care or the police; and,
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if an allegation re-surfaces after a period of time.

The school has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. All other records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

References

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious will not be included in employer references. Substantiated allegations will be included in references, provided that the information is factual and does not include opinions.

Learning lessons

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the case manager, in liaison with the LADO, should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures to help prevent similar events in the future.

This will include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons can also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases (those in which the allegation is not substantiated), the case manager will consider the facts and determine whether any improvements can be made.

Non recent allegations

Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police. Non recent

allegations made by a child, will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. Abuse will be reported no matter how long ago it happened.

Appendix E: Managing Concerns which do not meet the harm threshold ('Low Level Concerns')

The term low level concern does not imply insignificance. It means that the behaviour towards a child does not meet the harm threshold above. It is any concern – no matter how small, and even if no more than a sense of unease or a nagging doubt – that an adult working in or on behalf of the school may have acted in a way which

- 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.

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;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

The school recognises that 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.

It is the school's policy that any such concerns, should be shared with the right person (see above), and recorded and dealt with appropriately.

It is important that low-level concerns are shared in order to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour constantly lived, monitored and reinforced by all staff.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported as per section 3 of this policy. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

All low-level concerns will be recorded in writing. The record will 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 will be respected as far as reasonably possible.

These records will be kept confidentially and held securely, in such a way which complies with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, with reference to the LADO.

Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

Such information will be retained at least until the individual leaves their employment.

References

The school will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

Responding to low-level concerns

If the concern has been raised via a third party, the Head will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help the Head to categorise the type of behaviour and determine what further action may need to be taken. Every action and decision will be recorded along with their rationales.

Part one: Safeguarding information for all staff

What school and college staff should know and do

A child centred and coordinated approach to safeguarding

1. Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance [Working Together to Safeguard Children](#).
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.
3. No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
4. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
 - protecting children from maltreatment;
 - preventing the impairment of children's mental and physical health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.
5. Children includes everyone under the age of 18.

The role of school and college staff

6. School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
7. **All** staff have a responsibility to provide a safe environment in which children can learn.
8. **All** staff should be prepared to identify children who may benefit from early help.¹ Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

¹ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).⁵ The [Teachers' Standards](#) apply to: trainees working towards QTS; all teachers completing

9. **Any staff member** who has **any** concerns about a child's welfare should follow the processes set out in paragraphs 55-70. Staff should expect to support social workers and other agencies following any referral.
10. Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
11. The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
12. The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.⁵

What school and college staff need to know

13. **All** staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include the:
- child protection policy, which should amongst other things also include the policy and procedures to deal with peer on peer abuse;
 - behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);²
 - staff behaviour policy (sometimes called a code of conduct);
 - safeguarding response to children who go missing from education; and
 - role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one (or Annex A, if appropriate) of this document should be provided to **all** staff at induction.

14. **All** staff should receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
15. **All** staff should be aware of their local early help³ process and understand their role in it.

their statutory induction period (newly qualified teachers [NQTs]); and teachers in maintained schools, including maintained special schools, who are subject to the Education (School Teachers' Appraisal) (England) Regulations 2012.

² All schools are required to have a behaviour policy (full details are [here](#)). If a college or chooses to have a behaviour policy it should be provided to staff as described above.

³ Detailed information on early help can be found in Chapter 1 of [Working Together to Safeguard Children](#).⁸ More detailed information on statutory assessments can be found in Chapter 1 of [Working Together to Safeguard Children](#).

16. All staff should be aware of the process for making referrals to children’s social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.⁸

17. All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children’s social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

18. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

What school and college staff should look out for

Early help

19. Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

Abuse and neglect

20. **All** staff should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect (see paragraphs 26-30), and specific safeguarding issues such as child criminal exploitation and child sexual exploitation (see paragraphs 32-39) so that staff are able to identify cases of children who may be in need of help or protection.

21. If staff are unsure, they should **always** speak to the designated safeguarding lead, or deputy.

22. **All** school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or deputy).

23. **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, sexual abuse, serious youth violence and county lines.

24. **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

25. **In all cases, if staff are unsure, they should always speak to the designated safeguarding lead (or deputy).**

Indicators of abuse and neglect

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

27. **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

29. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and **all** staff should be aware of it and of their school or colleges policy and procedures for dealing with it, (see paragraph 49).

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

31. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos⁴ can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

Child Criminal Exploitation (CCE)

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

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

⁴ Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.

by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

Further information about CCE including definitions and indicators is included in Annex B.

Child Sexual Exploitation (CSE)

36. 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 nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact 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.

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

38. 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 e.g. they believe they are in a genuine romantic relationship.

39. Further information about CSE including definitions and indicators is included in Annex B.

Female Genital Mutilation (FGM)

40. Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**.⁵ If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. See Annex B for further details.

Mental Health

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

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

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

⁵ Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

44. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.

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

Peer on peer abuse (child on child)

46. **All** staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

47. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence,⁶ 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,⁷ such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

⁶ For further information about sexual violence see Annex B.

⁷ For further information about sexual harassment see Annex B.

- consensual and non-consensual sharing of nudes and semi nudes images and or videos⁸ (also known as sexting or youth produced sexual imagery);
- upskirting,¹⁴ 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).

50. **All** staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Serious violence

51. **All** staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see paragraphs 33-35).

52. **All** staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance.⁹

Additional information and support

53. Departmental advice [What to Do if You Are Worried a Child is Being Abused Advice for Practitioners](#) provides more information on understanding and identifying abuse and neglect. Examples of [potential indicators of abuse and neglect are highlighted throughout the advice](#) and will be particularly helpful for school and college staff. The [NSPCC](#) website also provides useful additional information on abuse and neglect and what to look out for.

54. **Annex B** contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read the annex.

⁸ UKCIS guidance: [Sharing nudes and semi-nudes advice for education settings](#) ¹⁴ For further information about 'upskirting' see Annex B.

⁹ For further information about county lines see Annex B

What school and college staff should do if they have concerns about a child

55. Staff working with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.
56. If staff have **any concerns** about a child's welfare, they should act on them **immediately**. See page 22 for a flow chart setting out the process for staff when they have concerns about a child.
57. If staff have a concern, they should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).
58. Options will then include:
- managing any support for the child internally via the school's or college's own pastoral support processes;
 - undertaking an early help assessment;¹⁰ or
 - making a referral to statutory services,¹¹ for example as the child might be in need, is in need or suffering, or is likely to suffer harm.
59. The designated safeguarding lead or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.
60. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data

¹⁰ Further information on early help assessments, provision of early help services and accessing services is in Chapter 1 of [Working Together to Safeguard Children](#).

¹¹ Chapter 1 of [Working Together to Safeguard Children](#) sets out that the safeguarding partners should publish a threshold document that should include the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under section 17 and 47. Local authorities, with their partners, should develop and publish local protocols for assessment. A local protocol should set out clear arrangements for how cases will be managed once a child is referred into local authority children's social care.

Protection Act 2018 (DPA) and UK General Data Protection Regulation (UK GDPR). DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Early help

61. If early help is appropriate, the designated safeguarding lead (or deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to children's

social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Statutory children's social care assessments and services

62. Concerns about a child's welfare should be referred to local authority children's social care. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.** Referrals should follow the local referral process.

63. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

64. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local children's social care contact number.

Children in need

65. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. 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.

Children suffering or likely to suffer significant harm:

66. Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse and neglect, female genital mutilation, or other so-called 'honour'-based abuse, forced marriage and extra-familial harms like radicalisation and sexual exploitation.

What will the local authority do?

67. Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services;

- the child is in need and should be assessed under section 17 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Chapter one of [Working Together to Safeguard Children](#) provides details of the assessment process; and
- [further specialist assessments are required](#) to help the local authority to decide what further action to take.

68. The referrer should follow up if this information is not forthcoming.
69. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required).
70. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Record keeping

71. **All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

72. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

Why is all of this important?

73. It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action.¹² Further information about serious case reviews can be found in Chapter four of [Working Together to Safeguard Children](#). Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;

¹² An analysis of serious case reviews can be found at gov.uk/government/publications/analysis-of-serious-casereviews-2014-to-2017.

- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information with the right people within and between agencies;
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

What school and college staff should do if they have safeguarding concerns about another staff member

74. Schools and colleges should have processes and procedures in place to manage any safeguarding concerns about staff members (including supply staff, volunteers, and contractors). If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs). Details of your local LADO should be easily accessible on your local authority's website.

Further details can be found in Part four of this guidance.

What school or college staff should do if they have concerns about safeguarding practices within the school or college

75. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime and know that such concerns will be taken seriously by the senior leadership team.

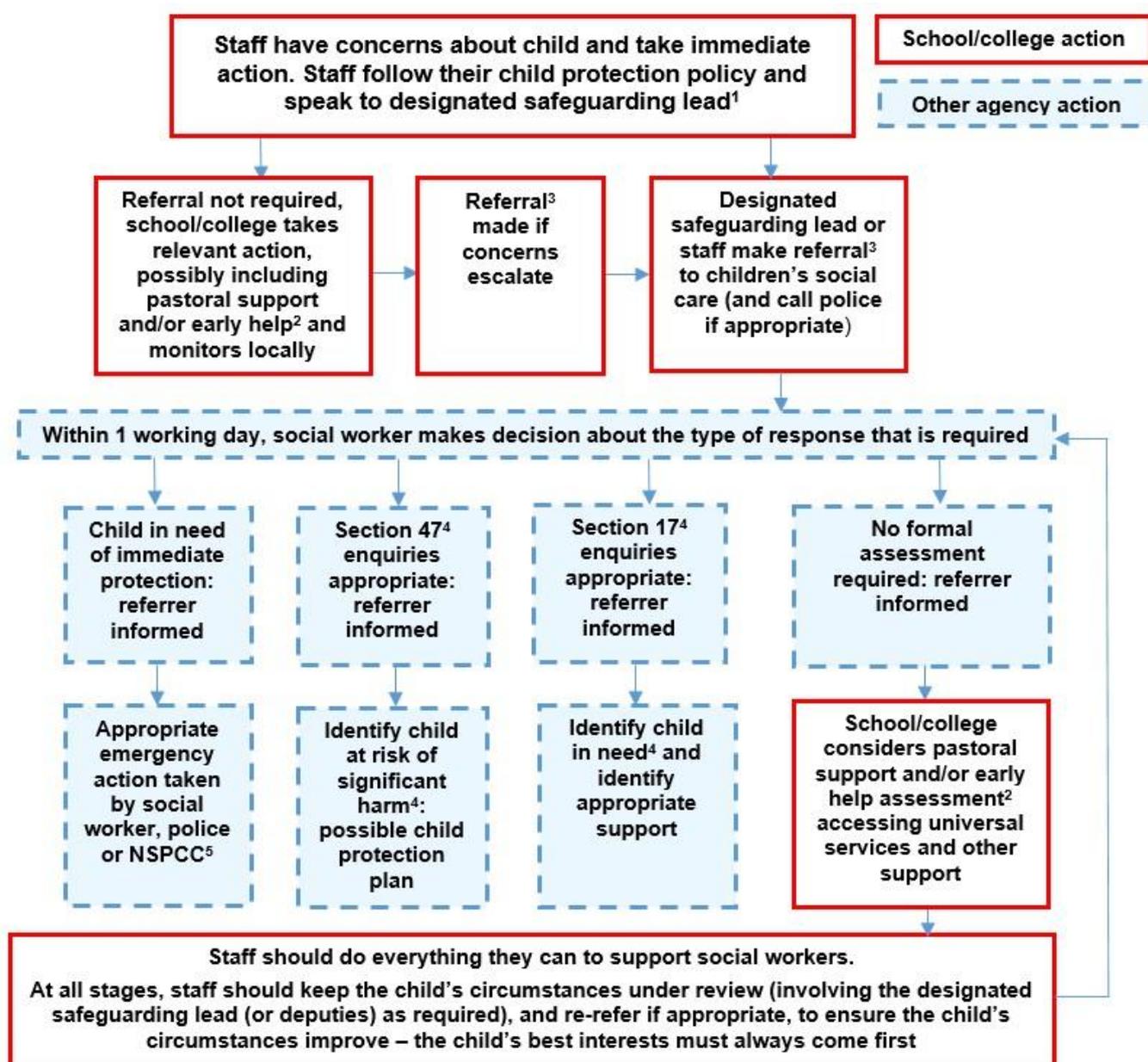
76. Appropriate whistleblowing procedures should be put in place for such concerns to be raised with the school's or college's senior leadership team.

77. Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the [NSPCC's what you can do to report abuse dedicated helpline](#) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled

by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.¹³

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

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. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

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](#).

¹³ Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain, Road, London EC2A 3NH.

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. Full details are in Chapter one of [Working Together to Safeguard Children](#).

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

Appendix G – A Complete and Exact Copy of Keeping Children Safe in Education (Annex B)

Annex B: Further information

Annex B contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part one of this guidance, if staff have any concerns about a child’s welfare, they should act on them immediately. They should follow their own organisation’s child protection policy and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately.

Table of Contents

Child abduction and community safety incidents	126
Children and the court system	126
Children missing from education	126
Children with family members in prison	127
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)	127
County lines	128
Modern Slavery and the National Referral Mechanism	129
Cybercrime	129
Domestic abuse	130
Homelessness	132
So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage)	133
FGM	133
Forced marriage	134
Preventing radicalisation	135
The Prevent duty	136
Channel	136
Additional support	137
Peer on peer/ child on child abuse	137
Sexual violence and sexual harassment between children in schools and colleges	138
Upskirting	141
The response to a report of sexual violence or sexual harassment	141

Child abduction and community safety incidents

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

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

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

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating [the courtroom structure and the use](#) of video links is explained.

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

Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

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

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

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

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

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.

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

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable

adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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

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

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

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

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

Modern Slavery and the National Referral Mechanism

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

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

Cybercrime

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

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

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

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

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

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

Operation Encompass

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system [ensures that when police](#) are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

National Domestic Abuse Helpline

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

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

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

Homelessness

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

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

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in

some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

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

Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**¹⁴ that requires a different approach (see following section).

FGM

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

FGM mandatory reporting duty for teachers

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

¹⁴ Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.¹⁵ Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

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

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

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

Preventing radicalisation

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

- **Extremism**¹⁶ is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation**¹⁷ refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism**¹⁸ 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.

¹⁵ Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

¹⁶ As defined in the Government's Counter Extremism Strategy
<https://www.gov.uk/government/publications/counterextremism-strategy>.

¹⁷ As defined in the Revised Prevent Duty Guidance for England and Wales.
<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

¹⁸ As defined in the Terrorism Act 2000 (TACT 2000)
<http://www.legislation.gov.uk/ukpga/2000/11/contents>

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

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

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

The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard¹⁹ to the need to prevent people from being drawn into terrorism".²⁰ This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Channel

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

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#).

Additional support

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

¹⁹ According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

²⁰ "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

The Home Office has developed three e-learning modules:

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

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

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

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

Peer on peer/ child on child abuse

Children can abuse other children (often referred to as peer on peer abuse) and it can take many forms. It **can** happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. 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 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.

Sexual violence and sexual harassment between children in schools and colleges

Context

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment 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.

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

Staff should be 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.

Staff should be aware of the importance of:

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

What is sexual violence and sexual harassment?

Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003²¹ as described below:

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

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

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

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

²¹ [Legislation.gov.uk](http://legislation.gov.uk).

What is consent?²² Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.¹³⁷ Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;¹³⁸
- sexual intercourse without consent is rape.

Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.¹³⁹ It may include:
 - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.¹⁴⁰ As set out in [UKCIS Sharing nudes and semi-nudes](#):

¹³⁷ [PSHE Teaching about consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

¹³⁸ It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice. ¹³⁹ [Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

¹⁴⁰ Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

²² It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way. More information: [here](#).

[advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence; ○ sharing of unwanted explicit content; ○ upskirting (is a criminal offence²³); ○ sexualised online bullying; ○ unwanted sexual comments and messages, including, on social media; ○ sexual exploitation; coercion and threats.

Upskirting²⁴

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Toolkits

- [Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- [Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.
- [Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- [Preventing Harmful Sexual Behaviour toolkit](#) by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.

²³ [The Voyeurism \(Offences\) Act 2019](#) which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

²⁴ Additional information can be found at [GOV.UK](#).

- [NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.

Additional advice and support

Abuse

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

Bullying

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

Children missing from education, home or care

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

Children with family members in prison

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

Child Exploitation

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

Drugs

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

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

- [Female genital mutilation: information and resources](#)- Home Office guidance

- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance
- fm@fcdo.gov.uk - Forced Marriage Unit (FMU) statutory guidance
- [FGM resource pack](#) – HM Government guidance

Health and Well-being

- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [Medical-conditions: supporting pupils at school](#) - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice

Homelessness

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

Private fostering

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

Radicalisation

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

Violence

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



Appendix H

Receipt of Safeguarding (Child Protection) Policy

Name:

Job Title:

I have received, read and understood the Hereford Cathedral School Safeguarding (Child Protection) Policy, including Part One and Annex B of Keeping Children Safe in Education (KCSIE).

Signature: Date:

**This page must be returned to the
Designated Safeguarding Lead**

Date of receipt Date of return