Safeguarding and Child Protection Procedure

Approved by   RET CEO for RET Board   **Approved on**   September 2025

RET contact   Headteacher   **Revision due**   Annually

This procedure should be read in conjunction with:
- The Safeguarding and Child Protection Policy
- Appendix 1 – Types and Signs of Abuse
- Appendix 2 – The Role of the DSL
- Appendix 3 – Specific Safeguarding Issues and Terminology
- Appendix 4 – Gender-Questioning Advice for Schools (for Leadership/staff with a safeguarding role)
- Appendix 5 – Self Harm Guidance for Schools (for Leadership/staff with a safeguarding role)

The Designated Safeguarding Lead (DSL) is Sally Trebess
The Deputy Designated Safeguarding Leads (DDSL) are Vicky Brooks, Kerry Course, Charlie Hurdle and Nicola Brown.
The named Governor for Safeguarding is Karen Lynch.
The named person for Looked After Children is Claire Dowsett.
The named person for Female Genital Mutilation is Sally Trebess.
The named person for Child Sexual Exploitation is Sally Trebess.
The Lead Mental Health Professionals are Andy Scott-Evans and Sally Trebess

If you suspect that a child is at imminent risk of danger, please call 999 without delay.

1. Safeguarding Culture

Our strong safeguarding culture ensures that we treat all pupils with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among pupils, and we set a good example by conducting ourselves appropriately.

Identifying safeguarding and child protection concerns often begin with recognising changes in pupils' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour or even bouts of absence may be an indicator of abuse.

All of our staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

2. Staff Training

a. All school staff must receive an annual Child Protection and Safeguarding update including information regarding how we keep children safe online (filtering and monitoring systems).

b. All school staff must sign to say they have read Section 1 of Keeping Children Safe in Education and the RET Child Protection Policy and Procedure.

c. Safeguarding Staff may complete online Level 2 Safeguarding training whilst waiting to attend face to face training (which is school and Local Authority Specific).

d. The school must keep records of who has attended an annual update and when and who has signed to say they have read and understood the appropriate documents.

e. Staff who are Level 2 Lead trained should renew their Level 2 training every 2 years.

f. All of the Leadership Team and the Safeguarding Manager should have at least online Level 2 training renewed every 2 years. This is so that if staff suffer prolonged absence there are others who are able to step in as DSL or DDSL. This can be completed on 'The Key'. DSLs and Safeguarding Managers should also attend their local training so that they understand their local services and context.

g. Level 2 training does not automatically make a staff member a DSL or DDSL. The latter must be appointed and named by the school.

h. All of the Leadership Team plus other interviewing staff should be Safer Recruitment trained. This should be renewed every 3 years. It can be completed on 'The Key'

i. The school must appoint a Lead Staff Member for Looked After Children, Female Genital Mutilation and Child Sexual Exploitation. This may be one staff member or three. Whoever is appointed to these roles must be appropriately trained and updated in these areas.

j. All RET schools will have a Lead Mental Health professional.

k. Any staff member who has Safeguarding as part or all of their role must read appropriate DFE guidance documents IN FULL e.g. Keeping Children Safe in Education, Working Together to Safeguard Children, Working Together to improve School Attendance, Criminal Exploitation; County Lines, Teaching Online Safety in Schools, Channel Guidance, What to do if you think a child is being abused; advice for practitioners, Filtering and Monitoring Standards in Schools.

l. It is the responsibility of the DSL to ensure that this is enforced. Any staff members who have Safeguarding as part of their role must have the opportunity to attend RET Safeguarding network events as appropriate.

m. All staff should receive a rolling programme of training on key safeguarding issues (Radicalisation, Domestic Violence, Sexism, Sexual Harassment and Violence, Honour Based Violence including FGM, Online safety and risks, Child Abduction and Community Risks, Child Sexual Exploitation, Drug and County Lines, Gangs and Violent Crime, Protected characteristics). These topics may be combined in training where appropriate.

3. Recognising Potential Abuse/Safeguarding Issues

Please see Appendix 1 and Appendix 3 to the Child Protection and Safeguarding Policy for specific types and signs of abuse.

4. Staff Child Protection/Safeguarding Concerns

a. Communicating with the DSL

All staff will refer concerns to the DSL/DDSL **verbally** where a child may be in imminent or immediate danger from suspected abuse. This takes priority over all other duties. Staff should be mindful that child on child abuse can take many forms and that some children have increased vulnerability. These include:

- bullying (including cyber-bullying)
- physical
- sexual; sexual harassment; 'upskirting'/'downing trousers'; sexting (taking, making or sharing images)
- initiation/hazing type violence
- children with (or with perceived) protected characteristics e.g. race, religion, sex, sexuality
- children with special educational needs also have extra vulnerabilities
- children who are absent from or have had periods of absence from school

These may happen online, offline, in or out of school. Staff should report seeing or hearing of any such behaviours to their DSL/DDSL.

b. Indirect Disclosures

Staff must be mindful that they will often overhear something or be told something vague rather than have something said to them explicitly. If this is the case a verbal report should be made to the DSL immediately and followed up by an entry on CPOMs within 24 hours.

c. Not being Ready to Talk

Staff must be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

d. Leaving full disclosures to the DSL where possible

All staff, where possible will leave the DSL/DDSL/Safeguarding Manager to take full disclosures from children as they have specific training. Increasingly, our schools have specialist safeguarding staff who are also trained to take disclosures. The DSL may ask them to do so. If children approach these specialist staff directly, the DSL/DDSL should still be kept informed. This does not prevent any member of staff from making a referral as per Keeping Children Safe in Education if they have concerns.

e. Referring Initial Concerns to the DSL, Monitoring, Recording and Reporting (all staff)

Brief notes should be made at the time or as soon as possible after there is a suspicion that is being referred to the DSL (CPOMS may be used at all stages). They should include:

i.   Date and time of observation
ii. Place and context of observation
iii. Factual account without emotive language

f. **Procedure:**

Remember to keep to factual information and not assumption or interpretation. Use the child's own language rather than translating it into your own words. Be aware that your report may be used at a later date to support a referral to an external agency and even possibly at a criminal hearing. Make additional records of discussion that takes place.

g. **If staff other than the DSL have to take a disclosure**

Should a child make an initial disclosure of abuse (of any type) to staff, and staff are unable to ensure the DSL/DDSL takes the disclosure, staff will:

i.   Listen to the child, keep calm and offer reassurance without questioning.
ii.   Remain impassive – reassure and not form or pass judgement on any party verbally or otherwise.
iii. Observe visible signs of abuse e.g. bruising but not ask children to remove clothing.
iv.   Listen to the child but refrain from asking leading questions e.g. 'What happened next' as this may compromise a police investigation.
v.   Accept what a child says without challenge, reassure them that they are doing the right thing and that you recognise that what they are doing is difficult.
vi.   Do not lay blame and/or criticise either the child or the alleged perpetrator.
vii. Do not promise confidentiality – explain that they have done the right thing, who you will need to tell and why.
viii. Make detailed notes of what the child says, preferably word for word.
ix.   Note the date and time of disclosure.
x.   Note the place and context of disclosure.
xi.   Once a verbal referral is made to the DSL, ensure CPOMs is updated with the information within 24 hours and as soon as possible.

h. **Possible Physical Abuse (Bruises, Burns, Scars etc.)**

Should a member of staff suspect physical abuse a body map sheet should be completed (paper based or CPOMs report). Again, the date, time, place, context of noticing the potential abuse should be documented. The DSL/DDSL should be alerted to the report as soon as possible.

i. **Referrals made in Term Time/School Time**

During school/term time the DSL/DDSL/Safeguarding Manager is advised to refer Child Protection/Safeguarding issues to the local authority.

j. **Out of school/term time e.g. weekends**

a) Occasionally staff may be alerted to CP/Safeguarding concerns e.g. it is possible to Facebook message a user without having access to their account. Should staff have such concerns they should refer these directly to the local authority/local Safeguarding Children Partnership using the following contact details:

Essex local authority service: 0345 603 7627. Havering: 01708 433222. If you are unsure, look up the student's address on BROMCOM. The local authority will advise you if they are not responsible for that postcode.

i. The staff member should email/telephone the DSL to alert them to what has happened and what they have done. Please note that it is a criminal offence to ignore potential safeguarding issues at any time.
ii. The online tool [Report Child Abuse to Your Local Council](#) directs to the relevant local authority children's social care contact number.

k. **Referrals to Local Authorities/local Safeguarding Children Partnerships**

i. These should be made by appropriate school staff where possible e.g. The DSL. If a case is referred to the DSL, the DSL should make the referral within 24 hours no matter what he/she deems is the level or urgency. If the case is deemed as urgent because the child is at risk, the referral should be made before the child goes home where possible.
ii. Consent from parents/legal guardians should be sought, however if it cannot be gained this does not and should not prevent the referral from being made.

iii.   Parents/carers should be informed of the referral immediately unless doing so would put the child at risk. In these cases, the advice of the local authority/local Safeguarding Children Partnership should be sought and a record made of any conversation/email exchange on CPOMs.

iv.   A record of any information sharing decision should be kept on CPOMs e.g. referred to XXX on XXX date because XXX.

v.   If the DSL/Headteacher feels that the appropriate action has not been taken by the Local Authority/Safeguarding Children Partnership after the first referral and after having chased it, they should re-refer stating their reasons for doing so.

vi.   Local authority thresholds are not always the same as Keeping Children Safe In Education thresholds. School staff work to KCSIE first and foremost; this is a legal requirement.

vii.   The Local Authority may tell staff that something doesn't warrant a referral. It is the school's decision whether or not to refer based on KCSIE requirements, not the Local Authority's.

viii.   Referrals should be made using the appropriate local authority referral process.

5.   Staff Concerns About Other Staff

a.   Should staff have concerns about other staff members with relation to child protection and safeguarding, these will be reported verbally to the DSL and/or Headteacher immediately. Even if completely innocent of a safeguarding/child protection concern, if a staff member is participating in ill-advised activity, then steps need to be taken to protect their career and reputation.

b.   Should there be a safeguarding concern about the behaviour/activities of a 'hirer' of the school site in relation to the safeguarding of children (whether or not they attend the school) an immediate verbal report must be made to the DSL by the concerned person.

c.   Staff should follow up the verbal report with a written concern within 24 hours. This report should detail the nature of the concern, any relevant times/dates/places and be signed and dated.

d.   The Headteacher or the DSL will contact RET for advice on the process and the LADO (the Local Authority Designated Officer) with appropriate information within 24 hours of the report.

e.   If the complaint is about the DSL, DDSL or Headteacher then the CEO of RET and the LADO should be contacted immediately.
RET Central Office: 01330 363 9880
Local Authority Designated Officer (LADO) duty line: 03330 139 797

6.   Children Absent From Education

a.   Children who are absent from education for prolonged periods and/or repeated occasions might be more susceptible to abuse including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation, risk of forced marriage, risk of being an unsupported young carer. Staff must be alert to these risks.

b.   We closely monitor attendance, absence and suspensions and our DSL/Safeguarding Team will take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day.

c.   For further advice and guidance please read the RET Children Missing/Absent from Education policy.

7.   Mental Health

a.   We have an important role to play in supporting the mental health and wellbeing of their pupils.

b.   All staff are aware that mental health problems can be an indicator that a child has suffered or is at   risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.

c.   Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the Lead Mental Health Professional and DSL or DDSL/Safeguarding Manager.

8.   Children with Protected Characteristics

a. In the UK, these are age, disability, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation and gender reassignment.
b. The fact that a child has a protected characteristic is not an inherent risk factor for harm.
c. Unfortunately, children (and sometimes adults) with protected characteristics can be targeted by other children.
d. We will ensure that all children who have a protected characteristic and are in need of support, have a trusted adult with whom they can be open.
e. Our staff will work to reduce barriers and provide a safe space for those children to speak out and share their concerns.

9. **Trips and Off-Site Events**
   a. Each trip or off-site event will have a risk assessment which takes safeguarding of children into account.
   b. Each residential trip's risk assessment will refer to any risk assessment completed by the trip company/prover/accommodation.
   c. Each Trip Leader will be briefed by the Headteacher/DSL regarding procedures both before a trip takes place and should there be a safeguarding concern whilst the trip is taking place (in and out of school hours).
   d. Individual pupils who have a high level of need or present additional risk on trips/off site events will have a separate individual risk assessment on RET systems. A decision will be taken by the Headteacher and DSL regarding which children need their own and which might be subsumed into the general risk assessment.

10. **Curriculum**
    a. Schools should plan PSHE and Tutor Time/Assembly curriculum and consult RET and the DSL where there are sensitivities e.g. in RSE delivery (Relationships and Sex Education).
    b. Teachers should be mindful of the fact that within the curriculum there will be opportunities to discuss some issues which some children might find sensitive and/or disturbing. Care will be taken particularly with regard to discussion about families and their make-up. Assumptions about family members and the presence of both parents should be avoided both in discussion and the presentation of materials.
    c. Staff planning PSHE and tutor sessions should be familiar with the January 2023 DFE guidance on 'Teaching Online Safety in Schools'
    d. All pupils should be taught about consent and what constitutes harassment.
    e. Pupils should receive information on what constitutes risky behaviour and the impact of such behaviour at appropriate points in their school career. This includes use of drugs and alcohol, healthy relationships, and safe behaviour online.

11. **Pastoral Care**
    a. All form tutors and subject teachers are responsible, in conjunction with other school staff, for the pastoral needs of the children in their care. This includes maintaining opportunities for children to share their concerns as appropriate.
    b. For children who are at risk, the school may be the one stable place from which they can expect security and reassurance. It is important not only to be alert to potential abuse, but also to support and help children through difficult times. This includes providing them with coping skills that can help avoid situations and dealing with the emotional difficulties following should they experience such situation.

12. **Advice on Key Issues**
    a. DSLs/Safeguarding staff should telephone their RET Lead Adviser or the RET CEO or Safeguarding Lead for advice on specific complex cases or referrals. Advice should be sought where the school has not had experience of dealing with a specific situation.

13. **Physical Contact**

a. School staff should be mindful of the fact that physical contact with children is ill-advised save for when necessary, e.g. in PE and Drama where demonstrating specific skills/poses.

b. Physical restraint should only be used where one child is endangering the safety of others, themselves or physical property. A report should be completed following use of restraint by the staff member restraining (and any staff/pupil witnesses) as soon as possible afterwards and submitted to the Headteacher and DSL; this can be done via CPOMs.

c. Where possible, restraining staff should be restraint trained.

14. Contact with Parents or Pupils

a. Staff should be mindful that contact via private telephone, social media, online shared gaming etc. can be misconstrued and is ill-advised and should use school systems only to discuss school business.

15. Inter-Agency Liaison and Working with External Services

a. **Inter-Agency Meetings**

At times, relevant school staff will be called upon either to contribute information to or participate in meetings involving external services. These might include:

- Strategy discussions.
- A child protection review conference.
- Family group conferences – for Children in Need (CIN), in a range of circumstances where a plan is required for the child's future welfare.
- Professionals' meetings – at which representatives from different professions are asked to meet to discuss children and their families with a view to providing support or making recommendations regarding the next stages of involvement.
- Core Group Meetings – meeting with a 'core' group of professionals associated with the family are asked to meet to review the progress of actions decided at case conferences and register view.

b. **Providing Appropriate Information**

At these meetings, appropriate staff should be appropriately prepared to report information about:

- Attendance and punctuality.
- Academic achievement.
- Behaviour and attitude.
- Relationships with peers and social skills.
- Physical appearance and readiness for school.
- Contact with parents/carers.
- Specific incidents of interest.
- CP concerns if appropriate to forum.

c. **Information Collection/Delivery**

Prior to these meetings, class teachers and any other adults working closely with the child should be asked for their comments. Following the meeting, relevant staff should be informed of any action they need to take as a result of the meeting.

d. **GDPR**

Attending staff should be conscious of GDPR regulations and the complexities of releasing personal information about a child e.g. for a CPOMs record to be released to a parent, a Subject Access Request must legally be made to the Data Protection Officer and not handed over by a member of the Safeguarding or Year Team. A separate advice sheet is available for staff to consult.

e. **The Child Protection Register**

There are two types of Child Protection Plan:

Child in Need or CIN Section 17 (where children require intervention, but this may be a supportive measure)

Child Protection or CP Plan Section 47 (where a child is/has been in a situation associated with significant risk).

f. **Phase, Key Stage and In-Year Transfer**

Schools should ensure that they have collected and read CP files containing CIN or CP plans by the end of September (new intake and other joiners) and that they have a chronology of events (CPOMs may be used for file transfer and chronologies). In year transfer files should be read within a week of a child joining by the Safeguarding Manager/DSL and a note added to CPOMs to say when read.

g. Leavers

Where children with CP files (CIN or CP) leave the school, the original files must be securely transferred to the new school within 5 working days or within 5 days of a new year/term. This is the responsibility of the DSL. CP files should be sent securely and proof of sending and receiving should be retained.

h. Off Roll with No Receiving School

If the child is removed from roll by a parent with the intention of home education, the parent should be met/contacted/messaged to ensure that this is in the best interests of the child.

i. Missing in Education

If a child is absent for 15 days or more for any reason, the Trust 'Eyes on' guidance should be consulted If they cannot be contacted a referral must be made to the local authority.

i. Storage of Child Protection Files

Any hard copy Child Protection files (CP, CIN or otherwise) should be uploaded to CPOMs.

j. Ensuring information is shared appropriately

CPOMs settings should allow the staff who need information to be able to access it.

k. Access to CP files

CP files should not be accessed by all staff, only those who are involved in the child's support e.g. The DSL, The Head of Year.

l. Early Help

Once a referral is made to the local authority, they will assess which service is best suited to helping the child and/or family. In some circumstances they may refer to 'Early Help'.

     i. What is Early Help?

         Early Help are family services set up by the local authority who provide help and support before a child needs child protection intervention e.g. a family coach.

     ii. Referrals

         A school or individual staff member is able to refer directly to early help if it has exhausted all internal support without success or if it is felt that a child needs specific intervention. The DSL will ordinarily make the decision as to whether or not to apply for Early Help if it is accessible and seek the permission of parents/carers.

16. Child on Child Abuse

a. Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. Allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

b. All staff will maintain an attitude of 'it could happen here'.

c. There are posters around the school encouraging both staff and pupils to speak to the safeguarding team should they be worried about something or someone.

d. If a child makes an allegation of sexual abuse against another child

- Tell the DSL/DDSL immediately and record the allegation but do not investigate.
- Make sure you record the exact words used by the child.
- The DSL will contact the local authority and police and follow their advice (all instances of possible law breaking will be reported to the police and a crime number recorded).
- The DSL will put a risk assessment in place for all children involved.

e. Venues for Child-on-child abuse

- Online
- Offline/in person
- In School

- Out of school
f. Child on child abuse can take many forms:
  - **physical abuse** such as shaking, hitting, biting, kicking or hair pulling
  - **bullying,** including cyberbullying, prejudice-based and discriminatory bullying
  - **sexual violence and harassment** such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks or jokes: Centre for Expertise on Child Sexual Abuse: Resources for education settings
  - **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 or pulling trousers or shorts down** which may involve taking a picture under a person's clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress or alarm
  - **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery**) including pressuring others to share sexual content
  - **abuse in intimate personal relationships between peers (also known as teenage relationship abuse)** - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
  - **initiation/hazing** – used to induct newcomers into sports team or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond
g. All staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place. Staff will be vigilant.
h. We take the following steps to minimise or prevent the risk of child-on-child abuse:
  - Promoting an open and honest environment where children feel safe and confident to share their concerns and worries.
  - Using assemblies to outline acceptable and unacceptable behaviour.
  - Using RSE, PSHE and tutor time to educate and reinforce our messages through stories, role play, current affairs and other suitable activities.
  - Ensuring the school is well supervised, especially in areas where children might be vulnerable.
i. Staff should report any such behaviours/suspected behaviours immediately to their DSL/DDSL.
j. The DSL/DDSL will decide who will deal with the reported incident. The DSL/DDSL will however retain oversight of actions.
k. Investigating allegations
  i. *Gather information* – children and staff will be spoken with immediately and dated, signed statements taken to gather relevant information. These should be uploaded to CPOMs and saved in the appropriate 'document vault' for the child. Ideally, children should not be together when writing statements. If they are then appropriate steps should be taken to ensure they write them independently.
  ii. *Decide on action* – if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour alongside the Child Protection and Safeguarding Policy.
  Please note that if a criminal offence has been committed e.g. alleged sexual assault, the police will be informed immediately by the DSL.
  iii. *Inform parents* - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the child and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
  iv. *Record* – all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential and stored securely on CPOMs or relevant behaviour record. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome.
  v. Where allegations are of a sexual nature, the DSL will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education.
  vi. Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this procedure. However, the names of

staff in the Safeguarding Team are freely available on posters should a child prefer to speak to a specialist staff member.

l. Supporting those involved

    i. Our staff reassure all victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

    ii. Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation potentially by multiple perpetrators.

    iii. The support required for the child who has been harmed will depend on their particular circumstance and the nature of the abuse. The support we provide could include referral to counselling and mentoring or some restorative justice work.

    iv. Support may also be required for the pupil that caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. The consequences for the harm caused or intended will be addressed.

m. Any DDSL, Head of Year or other Safeguarding staff appointed to deal with incidents should keep detailed records of actions, contacts and conversations related to the incident on CPOMs.

n. Any pupil or staff statements taken should be dated, signed and timed and uploaded to CPOMs. Child on child abuse should not be tolerated and should be dealt with under the behaviour policy. If there are safeguarding concerns for any involved parties, referral to police and/or local authority services should be considered, especially where behaviour concerns abuse related to 13 and/or is serious and potentially a criminal offence i.e. if it

- Could put children in the school at risk.
- Involves children being forced to use drugs or alcohol.
- Involves sexual exploitation or harassment e.g. indecent exposure.
- Involves repeated physical harm e.g. bruising.

17. Honour Based Abuse and FGM Referrals (Female Genital Mutilation)

a. Honour based abuse includes forced marriage, Female Genital Mutilation, Breast Ironing and any practice that is against British law

b. It is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding unofficial 'marriages' as well as legal marriages.

c. Definition of FGM
The DFE's 'Keeping Children Safe in Education' explains that FGM comprises 'all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs'.

d. Reason for Emphasis of Importance
FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

e. Suspicion of Honour Based Abuse

    i. Any staff member who discovers that an act of FGM or breast ironing appears to have been carried out on a child under 18 must immediately report this to the police personally. This is a statutory duty and teachers will face disciplinary sanctions for failing to meet it.

    ii. The duty does not apply in cases where a child is at risk of FGM or FGM is suspected but is not known to have been carried out. However, this should still be reported using the 101 number with the DSL/DDSL present where possible and the DSL should refer the case to the local authority within 24 hours and immediately if a child is at imminent risk of danger.

    iii. Staff should NOT examine children or ask to see any part of their body related.

    iv. Further advice can be obtained from the NSPCC on 0808 800 5000.

    v.   Any staff member who suspects impending or occurred FGM, breast ironing, forced marriage or other honour-based violence must verbally report immediately to the DSL who will immediately refer to the Local Authority and may call the police if they suspect a crime has happened or is about to happen.

18. Referrals for Extremism and/or Radicalisation

a. Referrals for Extremism including Radicalisation should be made through the normal local authority process by the DSL (or other staff if they cannot reach the DSL) – see process for referral.

b. Where the DSL/staff member has concerns there is a Department for Education telephone helpline 020 7340 7264 that can be used to discuss individual cases.

c. The DSL/staff may also email counter.extremism@education.gov.uk but this email IS NOT for use for emergency situations.

d. In an emergency, call 999 or the anti-terrorist hotline on 0800 789 321 if you think someone is in immediate danger; think someone may be travelling to join an extremist group; see or hear something that may be terrorist related.

19. Referrals for Sexual Violence

a. Even if a victim requests otherwise, if you suspect that a child has been raped or subject to another form of penetrative or sexual assault, the DSL should report this to the police immediately as well as making the referral to the local authority.

b. If it has already been reported to police, the DSL should contact the school police liaison or such like to ensure the child is supported in school.

c. A crime number and the name of the associated/investigating police officer should be recorded on CPOMs.

d. Confidence cannot be promised by any staff member.

e. RET should be contacted immediately for advice through the following process.

f. A risk assessment should be immediately written by the Headteacher and DSL (and updated as appropriate when meetings or information sharing occurs). This should be informed by the sexual behaviours traffic light tool.

g. If there is such an allegation in place, the alleged perpetrator should be removed from any shared classes. This is NOT an assumption of guilt; it is in the best interests of both parties as per DFE Guidance.

h. The Headteacher and DSL should also give thought to other times where the children may be in close proximity e.g. lunch hall, playground, public transport and put measures in place to prevent the contact.

i. The Headteacher should not wait for a local authority or police investigation or outcome before making decisions on balance of probability using the risk assessment in place with regard to consequences for individuals.

j. If either party are finding it difficult to attend school because of the close proximity and request a school transfer, they should be supported to make an appropriate move.

20. Sexual Harassment

a. Staff will be trained in sexism, sexual harassment and violence by the DSL, or a staff member experienced and up to date with national policy and agenda.

b. All staff will maintain an 'it could happen here' perspective.

c. All staff will be aware that addressing inappropriate behaviour can help prevent abusive and violent behaviours.

d. All staff will be aware that sexual harassment can be done by a group, not just an individual.

e. Sexual harassment can come in physical or non-physical forms. It includes 'upskirting', name calling and verbal abuse, online harassment and physical touching of clothing or body parts where consent has not been given.

f. Sexual harassment can be mistaken for banter or childish behaviour. It should however be recognised, taken seriously and dealt with accordingly.

g. If sexual harassment is identified, this should be reported by staff to the DSL/DDSL verbally and appropriate steps taken to involve parents and the local authority as appropriate and decide whether a risk assessment is needed.

h. The DSL/DDSL should seriously consider whether to make a referral to Early Help or to the Local Safeguarding Children Partnership.

i. It should be recognised that sexual harassment can be on or offline and that coercion can result in targeted children behaving in ways they wouldn't ordinarily (both on and offline)

j. Where a child has been sexually harassing another, an education session/programme should be put in place in order to address the inappropriate behaviour and details recorded on CPOMs.

21. **Online Safety**

a. Online safety risks can be categorised into four areas of risk:
   Content: being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism. Staff should be familiar with the meaning of the terms:
   > Misinformation – inaccurate information spread unintentionally
   > Disinformation – deliberate spread of false information
   > Conspiracy theories – attributing events to secret, malicious groups for which there is no evidence of existence

   Contact: being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children

   Conduct: personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying

   Commerce: risks such as online gambling, inappropriate advertising, phishing or financial scams.

b. *The school adheres to legislation regarding online filtering and monitoring.* This effectively means that pupils cannot access inappropriate material whilst on site or using school machines at home.

c. The school understands the risks of AI generative technology

d. The school has specific roles and responsibilities in place to ensure pupils are kept safe online whilst using school devices and within the school environment. The Online Safety Policy explains these roles. The DSL takes the lead role for online safety; this is in their job description (see appendix to Child Protection Policy).

e. Annual safeguarding updates include information about roles, responsibilities, filtering and monitoring provision, blocking and monitoring.

f. Our systems alert appropriate staff to 'key-strokes'. Teaching and support staff should be aware that if an adult or child steps away from their computer and leaves it unlocked this leaves them vulnerable to another individual typing something inappropriate which will be flagged to the safeguarding team and appropriate action taken.

g. Teaching and support staff must take responsibility for monitoring pupils when they are using ICT in school since filtering does not prevent inappropriate 'key-strokes'

h. Safeguarding teams will follow up on monitoring alerts in a timely fashion.

i. Pupils will be educated about online safety (see policy)

22. **Abuse/Inappropriate Images (Youth Produced/Involved Imagery/Sharing nudes and/or Semi-nudes)**

a. Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives.

b. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's AirDrop. It may also include the use of AI generative technology to create images that appear to be real people.

c. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Other terms used in education include 'sexting', youth produced sexual imagery' and 'youth involved sexual imagery'.

d. The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated.

e. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner.

f. Incidents may also occur where:

     i. children and young people find nudes and semi-nudes online and share them claiming to be from a peer

     ii. children and young people digitally manipulate an image of a young person into an existing nude online

     iii. images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

g. All incidents involving nude or semi-nude images including alleged deep fakes/AI generated will be managed as follows:

h. The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved and keep records of any interview.

i. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.

j. We will refer the matter to the police and/or children's social care as it is a criminal offence.

k. The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in March 2024 - [UKCIS advice 2020](#) (2024). The school will have regard to this advice when managing these issues.

l. The school will consider whether it is appropriate to put a risk assessment in place for any alleged perpetrator.

m. The following websites may be used by professionals within the school to seek help and advice e.g. in removing online content:
https://www.saferinternet.org.uk/professionals-online-safety-helpline
https://www.iwf.org.uk/
https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis
https://www.thinkuknow.co.uk/
https://www.gov.uk/government/publications/teaching-online-safety-in-schools
https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations

n. If there is an allegation of abusive/inappropriate messaging staff should ask children to screen shot where possible and the DSL will decide whether a local authority referral or police report should be made.

o. Where it is not possible to ascertain who has sent/received images, or in instances where multiple children are involved it may be necessary to investigate further and for appropriate trained staff to look at phones and ask other children for screen shots and written statements of when things were sent/received, in what context and what was sent and received.

p. Investigating staff should be mindful that it is a criminal offence to view and share such images and must document their actions on CPOMs to protect themselves.

q. Investigating staff should always consider that images or text may have crossed platforms (across different social media sites or apps) and not limit their investigation to one social media site.

r. Headteachers should make decisions about consequences on balance of probability and not wait for investigation of multiple platforms.

s. If a teacher sees sexual images or text relating to sexual behaviours of a child under 18 outside school hours, and they cannot reach their DSL, DDSL or Headteacher, they must speak to the police and make a local authority referral immediately.

t. If a member of staff finds inappropriate images on a device or in print at school e.g. on a pupil's phone this should be referred to the DSL immediately. If possible, they should remove the device from the location/person and hand it to the DSL.

u. Staff members should not seek to view inappropriate images (as in the Searching and Screening Advice from the DFE), they should alert the DSL instead.

v. Staff should NEVER copy inappropriate images to their own electronic devices (especially personal mobile phones).

w. Safeguarding Teams are advised to keep a locked safeguarding device that can be used to collect and/or destroy evidence where necessary.

x. Staff will be aware that commerce, including gambling online, also presents risks to children. Any suspected cases will be referred by staff to the DSL.

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y.   The DSL and Headteacher should annually update a risk assessment that considers and reflects the risks pupils face online.

z.   Parents will be informed of how school systems keep pupils safe on site by the DSL and the Headteacher and what systems cannot protect against e.g. 4g/5g private connections. Please see IT policies for more information.

23. Domestic abuse

a.   The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

b.   Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial and emotional abuse.

c.   Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

d.   Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

e.   Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the school has up to date safeguarding information about the child. Home : Operation Encompass

f.   All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

g.   Sometimes parents/carers are targets for physical abuse by children. If staff suspect or hear about such a case this will also be referred directly to the DSL who will consider making a referral to children's services.

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

a.   Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of 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. This power imbalance can be due to a range of factors, including:

- Age
- Gender
- Sexual identity
- Cognitive ability
- Physical strength
- Status
- Access to economic or other resources

b.   The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

c.   **Child Criminal Exploitation**

i.   CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing, being forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

ii. Children can become trapped by this 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 carry a knife for a sense of protection.

iii. Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

iv. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

d. **Child Sexual Exploitation (CSE)**

i. CSE is a form of child sexual abuse which 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 non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Centre for Expertise on Child Sexual Abuse: Resources for education settings

ii. 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.

iii. CSE can affect any child (or adult), who has been coerced into engaging in sexual activities. This includes 16- - 18-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.

iv. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

v. CSE indicators may be the same as CCE but may also include relationships with older men/women; STIs; pregnancy

e. We include the risks of criminal and sexual exploitation in our RSE and health education curriculum. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim. Victims of criminal and sexual exploitation can be boys or girls and it can have an adverse impact on a child's physical and emotional health.

f. All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns will be reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

25. County Lines

a. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children (sometimes primary school age) and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

b. County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child.

c. Children can be targeted and recruited into county lines in a number of locations, including schools. Indicators of county lines include those indicators set out in CCE indicators, with the main indicator being missing episodes from home and/or school.

d. Additional specific indicators that may be present where a child is criminally exploited include children who:

- go missing and are subsequently found in areas away from 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 with which they have no connection or in a hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

e. All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

26. Notifying Parents/Carers of Child Protection/Safeguarding Disclosures

a. We will notify parents/carers as soon as possible in the event of a disclosure to us or when we have a concern about the welfare of a child (within 24 hours). Other staff will only talk to parents/carers about any such concerns following consultation with the DSL.

b. If we believe that notifying parents/carers would increase the risk to the child, we will discuss this with the local authority children's social care team and/or with the police (as appropriate) before doing so.

c. In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

d. We will consult the police and social care before speaking to a parent/carer if we or other parties believe that a crime may have been committed.

e. Where we are asked by the police or children's services to delay contact with a parent, we will ask the relevant service for confirmation of this instruction in writing (an email will suffice).

27. Record Keeping

a. The school will keep detailed and comprehensive notes and chronologies with dates, times and staff signatures/codes. This includes records of follow up actions, phone-calls and meetings.

b. We will share this information only with appropriate agencies in line with local safeguarding procedures. The Data Protection Act 2018 and GDPR will not prevent us from keeping comprehensive records on CPOMs.

c. Schools will retain data in line with the Trust's data retention schedule.

28. Reviewing Safeguarding Cases

a. The school will review the cases of pupils with Safeguarding concerns on a regular basis. Timely actions will be taken by the school to move an ongoing case forward, chase external services with the aim of improving the circumstances for the child.

29. Children with Special Educational Needs and/or Disabilities (SEND)

a. Staff should be mindful that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. If they demonstrate certain behaviours, these may mistakenly be attributed to their SEND.

b. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:
   i. assumptions that indicators of possible abuse such as behaviour, mood and injury
   ii. relate to the child's disability without further exploration
   iii. children with SEN and disabilities can be disproportionally impacted by things like
   iv. bullying- without outwardly showing any signs and
   v. communication barriers and difficulties in overcoming these barriers.

c. The pastoral education plan.
   Children who are 'looked after' should have their own pastoral education plan which will be drawn up in discussion with social services, the Virtual School Headteacher, foster parents and the child themselves.

d. Where a child with recognised SEN makes a disclosure or appears to have mental health issues that present safeguarding risk, the DSL/DDSL/Safeguarding Team should be alerted immediately; information should not be confined to the SEN team. SEN children's safeguarding concerns should be treated in exactly the same way any other child's safeguarding concerns would.

30. Child Abduction and Community Risks

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a. Staff should be aware of 'non-resident' parents and be alert to the fact that sometimes child abduction can be committed by parents, other family members, neighbours or acquaintances. Should staff suspect this to be planned or to have occurred they should speak to the DSL and Headteacher immediately.

b. Staff should be mindful of anyone within the vicinity of the school who does not belong to the school community and has no business loitering. Duty staff should be alert to this issue. Any such occurrence should be telephoned into the school as soon as it is witnessed and the DSL and Headteacher should take appropriate action which may include talking to the police.

c. 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. This should be integrated into PSHE and/or tutor time activities in each year group as appropriate.

31. **Children (or parents of those children) who are questioning gender**

a. Please see RET written advice specifically for staff dealing with pupils who express feelings that they may be questioning their gender.

b. All cases must be referred to the Headteacher and DSL.

32. **Self-harm and Suicide Prevention**

a. Please see RET written advice specifically for staff dealing with pupils who self-harm or express suicidal ideation.

b. All cases must be referred to the DSL and Safeguarding Manager.

33. **Drugs and Medication**

a. Please refer to the anti-drugs policy and to the Pupils with Medical needs policy.

b. Safeguarding incidents involving drugs, alcohol or any concerning substances will be dealt with under the appropriate policy and procedure.

c. At no point will pupils or staff consume illegal or unlicensed drugs or medications/supplements on site. Pupils (with written parental permission) and staff are able to take licensed pain killers and prescribed medication on site.

d. All medications for pupils must be held by the office save for EpiPens and diabetes equipment which have to be held by the pupil.

e. If a staff member suspects that a pupil has been consuming/smoking unlicensed and/or unprescribed drugs or medications or any kind of alcohol this should be reported to the DSL verbally and immediately.

f. Our school is smoke free. Vaping (or smoking) is not permitted anywhere on site by either staff or pupils.

34. **Special Circumstances**

a. **Looked after Children**
The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

b. **Children who have a social worker**
Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decision about safeguarding and promoting the child's welfare.

c. **Work Experience**
The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with statutory guidance.

d. **Private fostering arrangements**

A private fostering arrangement occurs when someone <u>other than</u> a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will tell the DSL and the school will notify the local authority of the circumstances.

e. **Child Poverty**

Child Poverty impacts on a child's ability to learn and thrive in multiple ways. Our staff are vigilant and will report suspected child poverty and any accompanying safeguarding issues to the DSL and Safeguarding Manager. These may include children:

- who repeatedly move to different living spaces;
- who are ill equipped and/or are not completing homework;
- who are hungry and/or tired;
- who report being cold or hungry at home;
- whose mental health is deteriorating;
- whose focus is deteriorating in school;
- who are reluctant to take part in activities that need specific equipment or to put themselves forward for extra-curricular events or trips
- who are vulnerable to gangs or organised crime.

f. **Children who are absent from education**

Children who are absent from education for prolonged periods and or repeated occasions may be more susceptible to safeguarding issues. For the most vulnerable pupils, regular attendance is an important protective factor and the best opportunity for needs to be identified and support provided. Research has shown associations between regular absence from school and a number of extra-familial harms. This includes crime (90% of young offenders had been persistently absent) and serious violence (83% of knife possession offenders had been persistently absent in at least 1 of the 5 years of study). The school is mindful of this and reviews attendance regularly in order to take appropriate action. This may include referral to the local authority for safeguarding purposes.

g. **Alternative Provision**

Assurances that appropriate checks have been carried out on staff working at an Alternative Provision will be secured by the school. We will also ensure that we keep up to date with relevant changes e.g. to staff at any AP used. Our school will establish where children are during school hours. This includes those in Alternative Provision. Up to date records of AP addresses will be kept, as will sub-contracted provision or satellite sites that a child visits. Our school will review AP placements at least half termly in order to provide assurance that a child is a) regularly attending b) the placement continues to be safe and is meeting the child's needs. Where safeguarding concerns arise, the placement will be reviewed immediately and terminated if necessary unless or until concerns have been satisfactorily addressed.