

# Stepping Stones School

## Safeguarding & Child Protection Policy

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## **Safeguarding legislation and guidance**

The following safeguarding legislation and guidance has been considered when drafting this policy and can be referenced for further details.

- *Working Together to Safeguarding Children 2018*
- *Working Together: Transitional Guidance 2018*
- *Keeping Children Safe in Education 2020*
- *What to do if you're worried a child is being abused 2015*
- *Section 157 of the Education Act 2002*
- *The Education (Independent School Standards) Regulations 2014*
- *The Safeguarding Vulnerable Groups Act 2006*
- *The Teacher Standards 2012*

## **Policy statement and principles**

Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life. As a school we are committed to safeguarding and promoting the welfare of all our students.

The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the school.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. The procedures contained in this policy apply to all adults, staff, volunteers and governors and are consistent with those of the local safeguarding partner arrangements.

### *Our core safeguarding principles are:*

- safeguarding is everyone's responsibility
- the school's responsibility to safeguard and promote the welfare of children is of paramount importance
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review
- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support

Some areas, such as Health and Safety, are a specialist area of safeguarding and a separate lead for this area is in place in the school.

Safeguarding processes are intended to put in place measures that minimise harm to children. There will be situations where gaps or deficiencies in the policies and processes we have in place will be

highlighted. In these situations, a review will be carried out in order to identify learning and inform the policy, practice and culture of the school.

All students in our school are able to talk to any member of staff about situations or to share concerns which are causing them worries. The staff will listen to the student, take their worries seriously and share the information with the safeguarding lead. In addition, we provide students with information of who they can talk to outside of school both within the community and with local or national organisations who can provide support or help.

This policy is one of a series in the school's integrated safeguarding portfolio, including the following:

- *Code of Conduct for Staff & Volunteers*
- *Allegations Against Staff*
- *Low Level Concerns*
- *Recruitment Policy*
- *Complaints*
- *Pupil Behaviour*
- *IT Policies*

This policy is available on the school website and copies available from the school office. It aims:

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities and to signpost them to additional guidance
- To ensure consistent good practice
- To demonstrate the school's commitment regarding child protection to pupils, parents and other partners

As a school, we review this policy at least annually in line with DfE, Local Authority and any other relevant guidance.

### **Terminology**

- **Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of 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.
- **Child protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.
- **Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.
- **DSL** refers to the designated safeguarding lead at the school and **DDSL** their deputies
- **Child** includes everyone under the age of 18.
- **Parent** refers to birth parents and other adults who are in a parenting role, for example, step-parents, foster carers and adoptive parents.

### **Roles and responsibilities**

All schools should appoint a member of the senior leadership team to coordinate child protection arrangements.

Staff, parents and students may contact or work with any member of the named safeguarding team. However, there is a DDSL attached to class groups as follows and, although flexible to ensure the best fit is in place, it is likely that the named DDSL will be matched to work with students and their families as follows, overseen by the DSL.

**Other staff who are DDSLs and part of the Safeguarding Team are:**

<p><b>The DSL for child protection is Julie Goodyear</b>      <a href="mailto:julie.goodyear@steppingstones.org.uk">julie.goodyear@steppingstones.org.uk</a></p> <p style="text-align: center;">Director of Safeguarding (DSL), Welfare &amp; Pastoral Care</p>	
<p><b>The Lead Deputy DSL Whole School is Nanci Doyle</b></p>	<p><a href="mailto:nanci.doyle@steppingstones.org.uk">nanci.doyle@steppingstones.org.uk</a></p>
<p><b>DDSL Undershaw - Ben Bastin</b></p>	<p><a href="mailto:ben.bastin@steppingstones.org.uk">ben.bastin@steppingstones.org.uk</a></p>
<p><b>DDSL Tower Road - Sarah Hatherall-Good</b></p>	<p><a href="mailto:sarah.hatherall-good@steppingstones.org.uk">sarah.hatherall-good@steppingstones.org.uk</a></p>
<p><b>DDSL Whole School – Katherine Bourne</b> (Family Liaison Officer)</p>	<p><a href="mailto:katherine@steppingstones.org.uk">katherine@steppingstones.org.uk</a></p>
<p><b>DDSL Employability – Clare Wickens</b></p>	<p><a href="mailto:clare.wickens@steppingstones.org.uk">clare.wickens@steppingstones.org.uk</a></p>
<p>We also have a number of teaching, therapy, admin and TA staff who are trained to DSL level but are not on the named DSL/DDSL team. This is because of the nature of their roles. This includes Leigh Fisher and Jennie Yendell who are trained to DSL level to provide additional cover at the Tower Road site.</p>	
<p><b>Early Help</b></p>	<p>Katherine Bourne</p>
<p><b>Looked After Children</b></p>	<p>Nanci Doyle</p>
<p><b>Nominated Child Protection Governor</b></p>	<p>Claire Cookson <a href="mailto:claire.cookson@steppingstones.org.uk">claire.cookson@steppingstones.org.uk</a></p>
<p><b>The Headteacher</b></p>	<p>Jacqueline Silver <a href="mailto:jacqueline.silver@steppingstones.org.uk">jacqueline.silver@steppingstones.org.uk</a></p>
<p>The phone number for Stepping Stones School and to contact any member of the safeguarding team is: <b>01428 609 953</b>.</p>	
<p>You can also e mail: <a href="mailto:safeguarding@steppingstones.org.uk">safeguarding@steppingstones.org.uk</a> and all named DSL/DDSL staff will receive notification.</p>	
<p><b>Contact Children’s Services</b> (Referrals are made to the LA where the child lives)</p>	

Local Authority	Contact Details
<p><b>Surrey</b> <a href="https://www.surreycc.gov.uk/social-care-and-health/childrens-social-care/contact-childrens-services">https://www.surreycc.gov.uk/social-care-and-health/childrens-social-care/contact-childrens-services</a></p>	<p><b>Availability:</b> 9am to 5pm, Monday to Friday <b>phone:</b> 0300 470 9100 <b>Out of hours phone:</b> 01483 517898 to speak to our <b>emergency duty team</b>. <a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a></p>
<p><b>Hampshire</b> <a href="https://www.hampshirescp.org.uk/report-a-concern/">https://www.hampshirescp.org.uk/report-a-concern/</a></p>	<p>For urgent Child protection enquiries, professionals can phone: 01329 225379. For children living in the Hampshire Local Authority Area, the <a href="#">Interagency Referral Form</a> should be used when making a referral. The <a href="#">Hampshire Safeguarding Children Partnership and Children’s Trust Thresholds Chart</a> can help you to identify the risks and types of services a family may need.</p>
<p><b>West Sussex</b> <a href="http://www.westsussexscb.org.uk/professionals">http://www.westsussexscb.org.uk/professionals</a></p>	<p>If you are worried about a child contact the Multi Agency Safeguarding Hub (MASH) on <b>01403 229900</b> or email <b>MASH@WestSussex.gov.uk</b></p>
<p><b>Prevent</b></p>	<p>Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, following the <a href="#">Prevent referral process</a> and use the Prevent</p>

	<p>referral form to refer cases by e-mail to <a href="mailto:preventreferrals@surrey.pnn.police.uk">preventreferrals@surrey.pnn.police.uk</a> . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey</p> <p>The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264)</p>
<p><b>Inter-Agency Escalation</b> For the resolution of professional disagreements and instigation of responses to exceptional issues in work relating to the safety of children.</p>	<p><a href="#">SSCP multi-agency escalation procedures</a>, enquiries under section 47 of the Children Act 1989 and police investigations.</p>

Be prepared to refer directly (to the LA the child’s home address is in) or to the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.

**Local Authority Designated Officer (LADO)**

The LADO Service manages allegations against individuals who work or volunteer with children in Surrey. If you have a concern regarding someone who works with children please contact the LADO on **0300 123 1650 (Opt 3)** or [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk).

**Following a report of concerns the DSL must:**

[Using the SSCP Levels of Need](#), or the equivalent guidance for Hampshire/West Sussex etc. decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request for support must be made and the police if it is appropriate.

Normally the school should try to discuss any concerns about a child’s welfare with the family and where possible to seek their agreement before making a referral. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child’s views should also be taken into account.

If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the appropriate safeguarding partner. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the LA safeguarding partner of the occurrence and what action has been taken

If the DSL feels unsure about whether a referral is necessary, they can phone first to discuss concerns

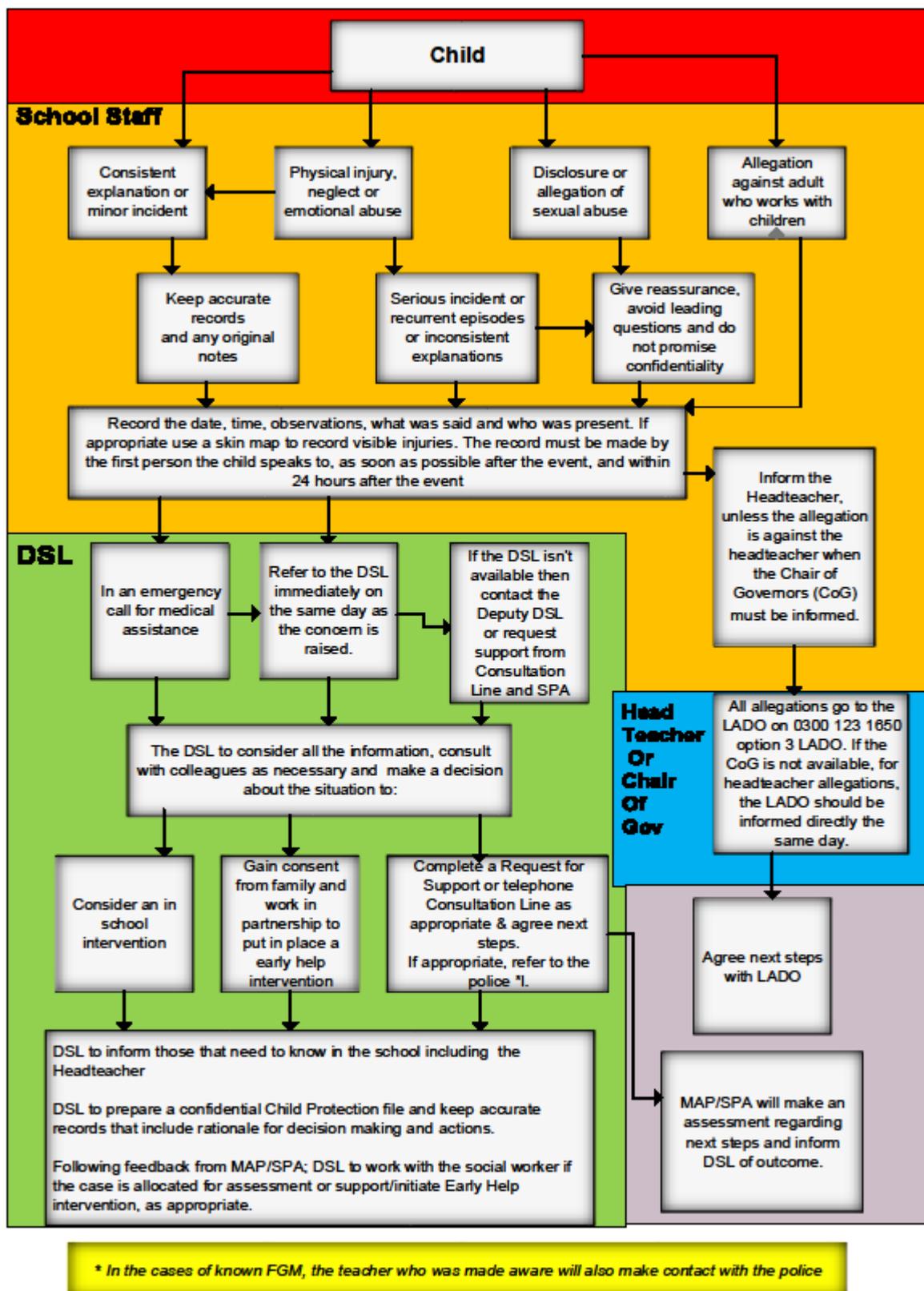
If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.

Where there are doubts or reservations about involving the child’s family, the DSL should clarify with the LA safeguarding partner or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.

When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the relevant Local Authority safeguarding partner/team depending on which county the child lives in. The DSL should seek advice about what action the safeguarding partner will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

Child Protection Procedures Flowchart (note that contact details are for Surrey)



## **The Designated Safeguarding Lead (DSL)**

The designated safeguarding lead (DSL) takes **lead responsibility** for safeguarding and child protection (including online safety) in the school. The DSL has the status and authority within the school to carry out the duties of the post, which include:

- ensuring the child protection policies are known, understood and used appropriately by staff, reviewed annually and publically available
- advising and supporting staff on child protection and safeguarding matters
- encouraging a culture of listening to children
- managing safeguarding referrals to children’s social care, the police, or other agencies
- taking part in strategy discussions and inter-agency meetings
- liaising with the “case manager” and the designated officer(s) at the local authority where allegations are made against staff
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child’s new school
- undergoing training and receiving regular updates to maintain the knowledge and skills required to carry out the role, including Prevent awareness training.

## **The Deputy Designated Safeguarding Leads (DDSLs):**

Are trained to the same level as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, the deputy DSLs carry out those functions necessary to ensure the ongoing safety and protection of pupils.

## **Children in Need (S17)**

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. A child who is deemed to be a Child in Need will have been assessed by Children’s Social Care under section 17 of the Children Act 1989.

## **Children suffering or likely to suffer significant harm (S47)**

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires 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, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extrafamilial threats like radicalisation and sexual exploitation. Should an investigation occur, then the school’s involvement and any action may be determined on the advice given by the investigating agency.

## **Good practice guidelines**

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them

- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to police or children's social care.
- staff working in line with the staff Code of Conduct.

### All staff

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a child home.

### Guiding principles – The Seven R's

<b>Receive</b>	<ul style="list-style-type: none"> <li>• Listen to what is being said, without displaying shock or disbelief</li> <li>• Accept what is said and take it seriously</li> <li>• Make a note of what has been said as soon as practicable</li> </ul>
<b>Reassure</b>	<ul style="list-style-type: none"> <li>• Reassure the pupil, but only so far as is honest and reliable</li> <li>• Do not make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'</li> <li>• Do reassure, for example, you could say 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'we are going to do something together to get help'</li> </ul>
<b>Respond</b>	<ul style="list-style-type: none"> <li>• Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details</li> <li>• Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court</li> <li>• Do not ask the child why something has happened.</li> <li>• Do not criticize the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible</li> <li>• Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff</li> </ul>
<b>Report</b>	<ul style="list-style-type: none"> <li>• Share concerns with the DSL immediately.</li> </ul>

	<ul style="list-style-type: none"> <li>• If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly</li> <li>• If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration</li> </ul>
<b>Record</b>	<ul style="list-style-type: none"> <li>• If possible, make some very brief notes at the time, and write them up as soon as possible</li> <li>• Keep your original notes on file</li> <li>• Record the date, time, place, person/s present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words</li> <li>• If appropriate, complete a body map to indicate the position of any noticeable bruising</li> <li>• Record facts and observable things, rather than your 'interpretations' or 'assumptions'</li> </ul>
<b>Remember</b>	<ul style="list-style-type: none"> <li>• Support the child: listen, reassure, and be available</li> <li>• Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues</li> <li>• Get some support for yourself if you need it</li> </ul>
<b>Review (led by DSL)</b>	<ul style="list-style-type: none"> <li>• Has the action taken provided good outcomes for the child?</li> <li>• Did the procedure work?</li> <li>• Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?</li> <li>• Is further training required?</li> </ul>
<p><b>inform the DSL in person or by phone as soon as possible so that you are sure that they are aware and log all information on CPOMS immediately. Do not rely on them seeing information solely via CPOMS.</b></p>	

### Safeguarding Record Keeping

At Stepping Stones School, we use CPOMS (Child Protection Online Monitoring System) for safeguarding records.

CPOMS is a software application for monitoring safeguarding & child protection. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management of safeguarding & child protection. Every member of staff across school has an obligation to report any concerns which they may have. CPOMS allows them to record information in a central repository and have relevant people alerted immediately. Senior leaders can build a chronology around a student and can produce reports for Case Conference Meetings, Governors and Ofsted at the touch of a button.

It is important that all concerns are properly recorded whether social services are involved or not. Records of concerns may reveal patterns which may indicate child abuse or identify unmet needs. The following information should be recorded; those marked with CPOMS will be automatically generated along with any previous history and or agency involvement:

- Name and address of the child. CPOMS
- Age and date of birth. CPOMS
- Name and address of adults involved. CPOMS
- Date and time of the alleged incident. CPOMS

- Nature of injury, or behaviour, or concern.
- If the child has an injury, when this was first noticed.
- The child's explanation of what happened in their own words.
- Adult's explanation of what happened – records should be reported factually. Where you include an opinion please state clearly that it is your own opinion and ensure it is distinct from your factual reporting
- Date and time of the record. CPOMS
- Any questions that were asked.
- Signature of Lead recording the incident.

If you do not have access to CPOMS there is a form at the end of this policy which can be used to share concerns with the DSL. The DSL would then scan and upload this to CPOMS for you.

#### Dealing with disclosures

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Headteacher or Safeguarding Governor of the school and/or may contact the Local Authority safeguarding partner.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

#### **If you are concerned about a pupil's welfare but there is no disclosure**

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be alarming, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use CPOMS to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL.

The information may be part of a bigger picture that the DSL is already aware of.

#### **Taking action & Reporting Concerns**

***Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of 'it could happen here'***

Key points for staff to remember for acting are:

- report your safeguarding concern as soon as possible to the DSL, interrupt any meeting if necessary and ensure that any information is shared and logged by the end of the day, and straight away where possible
- complete a record of concern on CPOMS or complete a form (attached to the end of this policy if you do not have access to the system) and pass to the DSL

- do not promise confidentiality to a student
- do not start your own investigation
- do not contact home, the DSL will manage this
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- remember your mandatory FGM reporting duty for those with QTS
- in any emergency take the action necessary to help the child (including calling 999)

### **Notifying parents**

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively, and the DSL/DDSL will be the person who will contact the parent in the event of a concern, suspicion or disclosure.

### **Referral to children’s social care**

The DSL will make a referral to children’s social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children’s social care if they genuinely believe independent action is necessary to protect a child.

### **Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children’s social care, police or the NSPCC if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the headteacher and the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil’s safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

### **Confidentiality and sharing information**

All staff will understand that child protection issues warrant a high level of confidentiality. Staff should only discuss concerns with the DSL, headteacher/principal or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

Following several cases where senior leaders in school had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (2020)* emphasises that **any** member of staff can contact children’s social care if they are concerned about a child.

Child protection information will be stored and handled in line with our Retention and Destruction Policy.

Information sharing will take place in a timely and secure manner and where:

- it is necessary and proportionate to do so; and
- the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Safeguarding forms and other written information will be kept in locked storage and any electronic information will be password protected and only made available to relevant individuals.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the data protection officer and headteacher.

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The school's confidentiality and information-sharing policy is available to parents and pupils on request.

### **Children who may be particularly vulnerable**

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that our pupils receive equal protection, we will give special consideration to children who are:

- students with special educational needs and disabilities
- living away from home or in temporary accommodation
- living in chaotic and unsupportive home situations
- living transient lifestyles
- affected by parental substance misuse, domestic violence or parental mental health needs
- vulnerable to being bullied, or engaging in bullying
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- do not have English as a first language
- at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

## **Mental health**

School staff see the student's day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of pupils.

The balance between the risk and protective factors can also be disrupted when difficult events happen in students' lives. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted
- life changes – such as the birth of a sibling, moving to a new house or changing schools or during transition from primary to secondary school, or secondary school to sixth form
- traumatic events such as bereavement, abuse, domestic violence, bullying, violence, accidents, injuries or natural disaster

When concerns are identified, school staff will provide opportunities for the child to talk or receive support within the school environment.

Parents will be informed of the concerns and a shared way to support the child will be discussed. Where the needs require additional professional support referrals will be made to the appropriate team or service with the parent's agreement or child's if they are considered to be competent.

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

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

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

The DfE has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#) (which may also be useful for colleges).

In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#).

Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

## **Students with special educational needs and disabilities**

We recognise that students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded.

Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Students being more prone to peer group isolation than other students
- Communication barriers and difficulties in overcoming these barriers to disclose
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- We offer extra pastoral support for our students who have SEN and disabilities. This includes, for example: mentoring; face to face counselling; talking therapy; or psychotherapeutic intervention.

### Intimate and personal care

<p><u>'Intimate Care'</u> can be defined as care tasks of an intimate nature, associated with bodily functions, bodily products and personal hygiene, which demand direct or indirect contact with, or exposure of, the sexual parts of the body. The Intimate Care tasks specifically identified as relevant include:</p> <ul style="list-style-type: none"> <li>• Dressing and undressing (underwear)</li> <li>• Helping someone use the toilet</li> <li>• Changing continence pads (faeces/urine)</li> <li>• Bathing / showering</li> <li>• Washing intimate parts of the body</li> </ul>	<p><u>'Personal Care'</u> involves touching another person, although the nature of this touching is more socially acceptable. These tasks do not invade conventional personal, private or social space to the same extent as Intimate Care. Those Personal Care tasks specifically identified as relevant here include:</p> <ul style="list-style-type: none"> <li>• Skin care/applying external medication</li> <li>• Feeding</li> <li>• Administering oral medication</li> <li>• Hair care</li> <li>• Dressing and undressing (clothing)</li> <li>• Washing non-intimate body parts</li> <li>• Prompting to go to the toilet</li> </ul>
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Personal Care encompasses those areas of physical and medical care that most people carry out for themselves but which some are unable to do because of disability or medical need. Children and young people may require help with eating, drinking, washing, dressing and toileting.

Where Intimate Care is required, we will follow the following principles:

- Have two members of staff present.
- Involve the child in the intimate care.
- Try to encourage a child's independence as far as possible in his or her intimate care. Where a situation renders a child fully dependent, talk about what is going to be done and give choices where possible. Check your practice by asking the child or parent about any preferences while carrying out the intimate care.
- Treat every child with dignity and respect and ensure privacy appropriate to the child's age and situation.
- Staff can administer intimate care but should always have a second adult present as we are aware of the potential safeguarding issues for the child and member of staff.
- Be aware of your own limitations
- Only carry out activities you understand and with which you feel competent. If in doubt, ASK. Some procedures must only be carried out by members of staff who have been formally trained and assessed.
- Promote positive self-esteem and body image

- Confident, self-assured children who feel their body belongs to them are less vulnerable to sexual abuse. The approach you take to intimate care can convey lots of messages to a child about their body worth. Your attitude to a child's intimate care is important. Keeping in mind the child's age, routine care can be both efficient and relaxed.
- If you have any concerns, you must report them
- If you observe any unusual markings, discolouration or swelling, report it immediately to the designated practitioner for child protection.
- If a child is accidentally hurt during the intimate care or misunderstands or misinterprets something, reassure the child, ensure their safety and report the incident immediately to the DSL. Report and record any unusual emotional or behavioural response by the child. A written record of concerns must be made available to parents and kept in the child's child protection record.
- Helping through communication
- There is careful communication with each child who needs help with intimate care in line with their preferred means of communication (verbal, symbolic, etc.) to discuss the child's needs and preferences. The child is aware of each procedure that is carried out and the reasons for it.
- Support to achieve the highest level of autonomy
- As a basic principle children will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each child to do as much for themselves as they can. This may mean, for example, giving the child responsibility for washing themselves. Individual intimate care plans will be drawn up for particular children as appropriate to suit the circumstances of the child. These plans include a full risk assessment to address issues such as moving and handling, personal safety of the child and the carer and health.

### **Physical Contact**

Some of our students might not understand or are still learning to understand the appropriateness of physical contact. Students may look to staff for approval and can test out responses too as they learn boundaries. Staff have a responsibility to support students to understand boundaries between adults and children.

It can be appropriate for children to be given some physical contact and comfort, but this must always be offered with caution and should be a sideways hug or a high five.

Other physical contact should only be applied if it appears as a strategy within their Education, Health and Care plan or has been requested formally by parents/carers and agreed by the Headteacher. For example, pressure applied to a shoulder(s) for support in grounding/sensory regulation.

Physical contact as a result of medical reasons, personal care requirements, within a practical subject e.g. PE and emergency support or intervention is acceptable.

The Code of Conduct provides staff with detailed guidance.

### **Recognising abuse**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

At Stepping Stones School, we consider the various factors that have interplay with the life of any student about whom we have concerns within the school and the level of influence that these factors have on their ability to be protected and remain free from harm.

The term 'abuse' is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Abuse 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 act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

### **Physical abuse**

Physical abuse is 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 physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- respiratory problems from drowning, suffocation or poisoning;
- untreated or inadequately treated injuries;
- bruising which looks like hand or finger marks or caused by an implement;
- cigarette burns, human bites; or
- scarring, scalds and burns.

### **Emotional abuse**

Emotional abuse is 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.

### **Domestic abuse**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person

over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

The school is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey Schools; where every school day morning our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

Emotional abuse often occurs when the child sees or hears domestic abuse occurring in the home. The cross-government definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional 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. Signs of emotional abuse tend to be behavioural rather than physical.

### **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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

The sexual abuse of children by other children is a specific safeguarding issue in education.

Signs of sexual abuse displayed by children may include:

- Pregnancy
- sexually transmitted infection/diseases;

- pain/itching/bleeding/bruising/discharge to the genital area/anus/mouth;
- urinary infections;
- difficulty walking or sitting or standing;
- persistent sore throats; or
- stomach ache.

## **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, 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. Signs of possible neglect include:

- the child seems underweight or is very small for their age, or their weight deteriorates;
- the child seems very overweight for their age;
- they are poorly clothed, with inadequate protection from the weather;
- they are often absent from school for no apparent reason; or persistently arrive late; or
- they are regularly left alone, or in charge of younger brothers or sisters.

## **Peer on peer abuse**

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSiE (2020)

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

We will minimise the risk of peer on peer/child on child abuse by:-

### Prevention

Taking a whole school approach to safeguarding & child protection

Providing training to staff

Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.

Engaging with specialist support and interventions.

### Responding to reports of sexual violence and sexual harassment

All staff must be alert to possible indicators of safeguarding concerns which may indicate peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical

harm;

- sexual violence and sexual harassment;
- sexting (also known as youth produced sexual imagery);
- initiation/hazing type violence and rituals; and
- ‘upskirting’

Children making a report of sexual violence or sexual harassment including “upskirting” (which is a criminal offence) will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.

Staff taking the report will inform the DSL or the Deputy DSL immediately.

Staff taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the child at greater risk).

### **Risk Assessment:-**

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider;

The victim, especially their protection and support.

The alleged perpetrator, their support needs and any discipline action.

All other children at the school.

The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school’s approach to supporting and protecting pupils.

Support regarding risk assessments can be accessed from the [Education Safeguarding Team – education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

### **Action: The DSL will consider:-**

The wishes of the victim.

The nature of the incident including whether a crime has been committed and the harm caused.

Ages of the children involved.

Developmental stages of the children.

Any power imbalance between the children.

Any previous incidents.

Ongoing risks.

Other related issues or wider context.

### **Options:**

Manage internally

Early Help intervention

Request for support to the C-SPA

Report to the police (generally in parallel with a request for support to the C-SPA)

### **Ongoing Response:**

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other children & adults affected will receive appropriate support and safeguards on a case-by-case basis.

The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.

The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

#### *References:*

[DfE Keeping Children Safe in Education 2020](#)

[DfE Sexual Violence and Sexual Harassment between Children in Schools and Colleges May 2018](#)

### **Harmful Sexual Behaviour**

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, the school can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

The school recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

### **Anti-Bullying/Cyberbullying**

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

We keep a record of known bullying incidents which is shared with, and analysed by the governing body. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will also consider child protection procedures.

PSHE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

### **Online Safety**

The school has an online safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents.

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and voodoo and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour involving webcam photography or face-to-face meetings.

Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school online safety co-ordinator is Katherine Bourne, Family Liaison Officer.

### **Racist Incidents**

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

### **One Chance Rule**

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

### **Honour Based Abuse (HBA) (including Female Genital Mutilation (FGM), Forced Marriage (FM) and breast flattening)**

The school is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

HBA includes all incidents or crimes which have been committed to protect or defend the honour of the community and/or the family, and commonly involve practices such as FGM, forced marriage and/or breast flattening.

Abuse often involves a wider network of family or community pressure and therefore it is important to be aware of this dynamic and consider risk factors when deciding on action.

If staff have a concern that a child may be at risk of Honour Based Abuse, they should alert their DSL immediately.

### **Female Genital Mutilation (FGM)**

FGM is abuse that encompasses all procedures involved in the partial or total removal of female external genitalia and is illegal in the UK. Whilst all staff should speak to the DSL (or deputy DSL) with regards to any concerns about FGM, there is a specific legal duty on teachers under the FGM Act (2003) to report FGM. 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, it is mandatory that the teacher must report this to the police using the telephone number 101.

### **Forced Marriage (FM)**

Forcing a person into marriage is a crime in England and Wales. FM is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage. The FM Unit provides more guidance and Multi-Agency guidelines, which focuses on the role of schools.

### **Breast Flattening**

Breast flattening, also known as breast ironing, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother, who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education, rather than be forced into early marriage. See Annex A of KCSIE for further details.

### **Behavioural signs of abuse and neglect**

If a child is being abused, their behaviour may change in a number of ways. For example, they may:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- become sexually active at a young age;
- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;
- refuse to attend school or run away from home;

- lack confidence or have low self-esteem; or
- use drugs or alcohol.

### **Signs of abuse or neglect manifested by the parents or other responsible adult**

- places unrealistic expectations on the child, i.e. demands a level of academic or physical performance of which they are not capable;
- offers conflicting or unconvincing explanation of any injuries to the child;
- appears indifferent to, or overtly rejects, the child;
- denies existence of or blames the child for the child's problems at home or at school;
- sees and describes the child as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the child's problems; or
- is isolated physically/emotionally.

### **Grooming**

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female, of any gender identity. They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified.

Children may:

- be very secretive, including about what they are doing online;
- have older boyfriends or girlfriends;
- go to unusual places to meet friends;
- have new things such as clothes or mobile phones that they can't or won't explain;
- have access to drugs and alcohol;
- go missing from home or school;
- display behavioural changes;
- have sexual health issues; or
- present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming.

### **Signs of grooming and/or online abuse**

A child may be experiencing abuse online if they:

- spend lots, much more, or much less time online, texting, gaming or using social media;
- are withdrawn, upset or outraged after using the internet or texting;
- are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

### **Signs of grooming manifested by sex offenders**

It is important to remember that not all sex offenders will exhibit the signs listed below and if an

individual exhibits some or all of these signs, it does not mean that they are a sex offender:

- Overly affectionate behaviour with a child;
- Affording special attention or preferential treatment to a child;
- Excessive time spent alone with a child outside of the classroom/school;
- Frequently spending time with a child in private or isolated areas;
- Transporting a child to or from the school;
- Making friends with a child's parents and visiting their home;
- Acting as a particular child's confidante;
- Giving small gifts, money, toys, cards, letters to a child;
- Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child; and/or
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature around a child.

### **Modus operandi of institutional grooming**

- Target vulnerable victim: Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
- Gain victim's trust: Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy.
- Gain the trust of others: Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large.
- Filling a need/becoming more important to the child: This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the child: The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.
- Sexualising the relationship: This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.
- Maintaining control and secrecy: Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

### **Radicalisation, Extremism and Terrorism**

[The Prevent Duty for England and Wales \(2015\)](#) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with 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.

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

The school is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

The school seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

School staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the [DfE advice Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).

The school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include, [due diligence checks for external speakers and private hire of facilities](#), anti-bullying policy and other issues specific to the school's profile, community and philosophy.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

They should then follow the safeguarding procedures and refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) following the [Prevent referral process](#) and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **Indicators of vulnerability to radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to

drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice or a feeling of failure,
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Needs and Disability – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors in all of the above could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

### **Signs of grooming for radicalisation**

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. For more information, please see the Preventing Extremism and Radicalisation Policy and Annex A of KCSIE.

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).

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. There are no known

definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way.

Signs of vulnerability include:

- Underachievement;
- Being in possession of extremist literature;
- Poverty;
- Social exclusion;
- Traumatic events;
- Global or national events;
- Religious conversion;
- Change in behaviour;
- Extremist influences;
- Conflict with family over lifestyle;
- Confused identity;
- Victim or witness to race or hate crimes; and
- Rejection by peers, family, social groups.

### **Child Criminal Exploitation (CCE) and Serious Violence**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, forced to shoplift or pickpocket, or to threaten other young people.

CCE also involves children and young people being coerced into moving drugs or money across the country; this is commonly referred to as County Lines.

County Lines usually occurs through engaging children into gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market and seaside towns. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These can 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.

More information can be found in KCSIE (2020), in the Home Office's 'Preventing youth violence and gang involvement' and its 'Criminal exploitation of children and vulnerable adults: county lines guidance'.

### **Contextual Safeguarding**

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

The contextual safeguarding approach says that children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

This also includes the risk of abuse occurring in or outside of school.

### **Child Sexual Exploitation (CSE)**

CSE is a form of abuse and occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse 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. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. CSE can affect any child or young person (male or female) under the age of 18 years, including 16-and 17-year olds, who can legally consent to have sex.

It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

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

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

For more information, see [Child Sexual Exploitation: Guide for Practitioners](#)

### **Children Missing In 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 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 unauthorised absence and their local authority's children missing from education procedures.

### **Pupils Missing Out on Education**

The vast majority of children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

The school will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable

The school will ensure that and parents (and the local authority where the pupil has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed;

The school will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it;

The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child

The school will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

The school leadership will report to governors of any formal direction of a pupil to alternative provision to improve behaviour.

The school leadership will report to governors information regarding the use and effectiveness of the use of alternative provision and modified timetables.

### **School Attendance and Behaviour**

Additional policies and procedures are in place regarding school attendance and behaviour.

The school recognises that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The school will work in partnership with Surrey Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **Restrictive Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in 'CPI' (crisis prevention institute) techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the school will consider the risks, given the additional vulnerabilities of these children.

Surrey County Council guidance [Touch and the use of restrictive Physical Intervention When Working with Children and Young People](#) provides further detailed information.

## **Children with family members in prison**

Schools should be aware if they have any children or young people on their roll whose parent or close family member is in prison and provide additional support. 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. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **Children who have a social worker**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker and inform schools whether the child is subject to a Child in Need (s17) or Child Protection (s47) Plan. The DSL should attend all 'plan reviews'.

Where children need a social worker, this should inform school decisions about safeguarding (for example, responding to unauthorised absence or missing education Child suffering or likely to suffer significant harm Children in need Early help Safeguarding and Child Protection Policy and Procedure 23 September 2020 where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## **Youth produced sexual imagery / 'Sexting'**

Whilst many professionals refer to the issue as 'sexting', there is no clear definition of 'sexting'. According to research, many professionals consider sexting to be 'sending or posting sexually

suggestive images, including nude or semi-nude photographs, via mobiles or over the internet.' Yet, recent NSPCC research has revealed that when children are asked 'What does sexting mean to you?' they are more likely to interpret sexting as 'writing and sharing explicit messages with people they know.'

Similarly, a recent ChildLine survey has revealed that many parents think of sexting as flirty or sexual text messages, rather than images. This policy only covers the sharing of sexual imagery by children. Possessing, creating, sharing and distributing sexual photos and videos of under-18s is illegal, and therefore causes the greatest complexity for schools (amongst other agencies) when responding. It also presents a range of risks which need careful management.

On this basis, this policy introduces the phrase 'youth produced sexual imagery' and uses this instead of 'sexting'.

This is to ensure clarity about the issues this advice addresses.

#### What is youth produced sexual imagery?

'Youth produced sexual imagery' best describes the practice because:

- 'Youth produced' includes children sharing images that they, or another child, have created of themselves.
- 'Sexual' is clearer than 'indecent'. A judgement of whether something is 'decent' is both a value judgement and dependent on context.
- 'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

#### What types of incidents are covered by this policy?

Yes:

- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18).
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult.
- A child is in possession of sexual imagery created by another child.

No:

- The sharing of sexual imagery of children by adults as this constitutes child sexual abuse and schools should always inform the police.
- Children sharing adult pornography or exchanging sexual texts which do not contain imagery.
- Sexual imagery downloaded from the internet by a child.
- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult.

This is in accordance with the new advice Sexting in schools and colleges: responding to incidents and safeguarding young people, which has been published by the UK Council for Child Internet Safety.

All members of staff (including non-teaching staff) should be aware of how to recognise and refer any disclosure of incidents involving youth produced sexual imagery. Disclosure about youth produced sexual imagery can happen in a variety of ways. The child affected may inform a class teacher, the DSL in school, or any member of the school staff. They may report through an existing

reporting structure, or a friend or parent may inform someone in school or a colleague, or inform the police directly. Any direct disclosure by a child should be taken very seriously. A child who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

### **Handling incidents**

All incidents involving youth produced sexual imagery should be responded to in line with this policy. When an incident involving youth produced sexual imagery comes to a member of staff's attention:

- The incident should be referred to the DSL as soon as possible;
- The DSL should hold an initial review meeting with appropriate school staff;
- The DSL will follow the procedures and guidance set out in 'Sexting in schools and colleges: responding to incidents and safeguarding young people';
- There should be interviews with the children involved (if appropriate);
- Parents of each child should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at greater risk of harm and jeopardise any police/social care investigation; and
- At any point in the process, if there is a concern that a child has been harmed or is at risk of harm, a referral should be made to Children's Social Care and/or the police immediately.

### **Private fostering**

What is private fostering? Private fostering is when a child or young person under 16 years old (or 18 if they have a disability) is looked after for 28 days or more by someone who is not a close relative, legal guardian or person with parental responsibility. Close relatives only include parents, stepparents, aunts, uncles and grandparents. It is not private fostering if the child is 'looked after' by the Local Authority (also known as 'in care' and which includes placement in residential care, with an approved foster carer or a 'kinship' carer).

Private fostering occurs in all cultures, including British culture, and children may be privately fostered at any age. Examples of private fostering situations include:

- children and young people living apart from their families for a variety of reasons e.g. a parent is ill, has had to temporarily move for work or there has been conflict, separation or divorce;
- children whose parents work or study elsewhere in the UK or overseas;
- children sent to this country by their parents for education and health care;
- young people living with the family of a boyfriend or girlfriend; and
- children on holiday exchanges. People become private foster carers for all sorts of reasons.

Private foster carers can be a family friend, or someone who is willing to care for the child of a family they do not know, for example host families supplied by a Guardianship Organisation.

If a host family is going to be caring for a child for 28 days or longer, they are classed as private foster carers and the Local Authority must be notified. Why does your Local Authority Children's Services need to know? By law, the Local Authority must be informed about all private fostering situations. The child's parents, private foster carers and anyone else involved in the arrangement or who becomes aware of the arrangement, e.g. guardianship agencies, schools or health professionals are legally required to inform Children's Services. Children's Services have a legal duty to make sure all private fostering arrangements are safe for the child. Once informed of the arrangement, they will check the suitability of private foster carers, make regular visits to the child and ensure advice,

help and support is available when needed. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement, s/he should raise this with the DSL.

Where Children's Social Care are not already aware of the circumstances, the DSL should make a referral to them.

Timescales for informing the Local Authority:

- The child is not yet living with the private foster carers Within 6 weeks beforehand
- The child will move in with the private foster carers within 6 weeks Immediately
- The child is already living with the private foster carers. Immediately

Surrey County Council Children's Services:

North east area (Spelthorne, Elmbridge and Epsom & Ewell) 0300 123 1610

South east area (Mole Valley, Reigate & Banstead and Tandridge) 0300 123 1620

North west area (Runnymede, Surrey Heath and Woking) 0300 123 1630

South west area (Guildford & Waverley) 0300 123 1640

**Website** <https://www.surreycc.gov.uk/.../types>

## **Looked After Children**

A child who is being 'looked after' by their Local Authority is usually known as a 'Child in Care' or a 'Looked After Child'. They might be living with foster parents or at home with their parents under an Interim Care Order granted to social care, or in residential children's homes, or other residential settings like schools or secure units.

A child who is adopted is not a Looked After Child. Occasionally, children are placed into Local Authority foster care under an Interim Care Order when an adoption breaks down and the adoptive parents relinquish the child.

Once a Full Care Order is agreed, the child remains on long term foster care. The adoptive parents may or may not have continued contact with the child, depending on the situation and the emotional impact on the child. An Interim Care Order will remain in place until care proceedings are concluded (within 26 weeks in most authorities). At the conclusion of care proceedings in any situation, the child will either stay in long term foster care (under a Full Care Order) until they reach the age of 18 years, return to their parents (usually under a Supervision Order), reside with other family members/friends (usually under a Special Guardianship Order), or in some cases be adopted. In all of the latter situations, it is most usual for parents to have agreed contact arrangements with their child, most commonly three times per year.

A child may also have been placed in care voluntarily by their parents who are struggling to manage their children's behaviour, or meet their child's needs due to their own illnesses or disabilities (under section 20, Children Act 1989). In these cases, rehabilitation will always be the aim, but if this is not possible, the Local Authority will apply for an Interim Care Order and finally a Full Care Order. Usually, these parents will have continued contact with their child.

As a result of their experiences both before and during care, Looked After Children are at greater risk than their peers; they are, for example, four times more likely than their peers to have a mental health difficulty. Providing a secure, caring environment and enabling such 6 Section 67(1) of the Children Act 1989 amended by the children Act 2004) and the Children (Private Arrangements for Fostering) Regulations 2005 Safeguarding and Child Protection Policy and Procedure 35 September

2020 children to develop strong, trusting and stable relationships with professionals is critical to their safety and wellbeing.

The LAC lead ensures that staff receive training on Looked After Children, including on the reasons children become looked after, their legal status, the support that staff can provide to keep such children safe and the ways in which they can maximise educational stability for Looked After Children.

The Looked After Children Lead, in collaboration with the DSL, (a) is responsible for ensuring that any looked after children are adequately supported by staff in school; (b) has contact details of the child's social worker and the name and contact details of the Virtual School Head for children in care; (c) ensures that relevant staff members have sufficient information about the child's looked after legal status and care arrangements; (d) works with the Virtual School Head to discuss how staff can best support the progress of Looked After Children in the school and meet the needs in the child's Personal Education Plan; and (e) attends Looked After Children reviews and other meetings they are required to attend.

### **Peer on peer abuse**

All staff should be alert to the risk of peer on peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers. They should never dismiss abusive behaviour as a normal part of growing up, 'banter' or 'just having a laugh', and should not develop high thresholds before Safeguarding and Child Protection Policy and Procedure 38 September 2020 taking action. Abuse is abuse and peer on peer abuse should be taken as seriously as abuse by adults.

#### What is peer on peer abuse?

For these purposes, peer on peer abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms, including, but not limited to, serious bullying (including cyber-bullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, 'upskirting' (see below), harmful sexual behaviour (see below) and gender-based violence.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys.

Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. Youth produced sexual imagery can but does not always constitute abusive behaviour. All incidents involving youth produced sexual imagery should be responded to with reference to the school's policy and in accordance with this policy (see above).

#### What role does gender play?

Children of all gender identities can both perpetrate and be the victim of peer on peer abuse, but this often manifests itself differently; girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

#### When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse, such as low level bullying (where the school's Anti-Bullying Policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include: a) where it is repeated over time and/or where the perpetrator intended to cause serious harm; b) where there is an element of coercion or pre-planning; and c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive, and staff should always use their professional judgment and discuss any concerns with the DSL.

#### How can I identify victims of peer on peer abuse?

Identifying peer on peer abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from peer on peer abuse overlap with those relating to other types of abuse – see indicators of abuse, earlier in this document.

#### Signs can include:

- a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect.
- b) physical injuries.
- c) having difficulties with mental health and/or emotional wellbeing.
- d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much.
- e) drugs and/or alcohol use.
- f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age.

This list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

#### Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by peer on peer abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

- a) peer on peer abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour.
- b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; or (iii) experienced considerable disruption in their lives.
- c) children with SEN/D and those who identify as LGBT+ are particularly vulnerable to both abuse and peer on peer abuse.

#### How prevalent is peer on peer abuse?

Recent research suggests that peer on peer abuse is one of the most common forms of abuse affecting children in the UK. For example, more than four in ten teenage schoolgirls aged between 13 and 17 in England have experienced sexual coercion (Barter et al 2015). Two thirds of contact sexual abuse experienced by children aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford et al 2011) and over a third of young boys in England admitted to

watching porn and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

*What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?*

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with this policy. If a child is in immediate danger, or at risk of harm, a referral to Children's Social Care and/or the police should be made immediately.

*How will the DSL respond to concerns of peer on peer abuse?*

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other child. Where the DSL considers or suspects that the behaviour might constitute abuse, Children's Social Care will be contacted immediately and, in any event, within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with Children's Social Care and agree on a course of action, which may include (a) taking any steps to ensure the safety and wellbeing of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services.

Any response should be decided in conjunction with Children's Social Care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children;
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved;
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves;
- take into account the complexity of peer on peer abuse and of children's experiences and consider the interplay between power, choice and consent.

While children may appear to be making choices, if those choices are limited, they are not consenting;

- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it, attitudes underlying it and the support that may be needed if the perpetrator is at risk.

Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it.

Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and wellbeing of the victim and other children in the school. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the school;

- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs;

(d) following the procedures set out in this Safeguarding Policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's wellbeing closely and ensuring that s/he receives on-going support from all relevant staff members within the school; (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term; and

- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring.

This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

#### How does the school raise awareness of, and reduce the risk, of peer on peer abuse?

Staff are informed on the nature, prevalence and effect of peer on peer abuse, and how to prevent, identify and respond to it. The school actively seeks to prevent all forms of peer on peer abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of peer on peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Children are educated about the nature and prevalence of peer on peer abuse via RE and RSE; they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the school's approach to such issues, including its policy towards all forms of bullying and peer on peer abuse.

#### **Sexual Violence and Sexual Harassment between Children**

Peer on peer abuse can include two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with, the school's wider approach to peer-on-peer abuse (see above). Sexual Violence includes sexual offences which fall under the Sexual Offences Act 2003. Sexual Harassment refers to 'unwanted conduct of a sexual nature'.

This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including but not limited to making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group;
- be perpetrated by a child of any age against a child of any age;
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation;
- include behaviours that exist on an often progressive continuum and may overlap; and/or
- be online and offline (physical or verbal).

Advice from the Department for Education on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (2017) provides information about what sexual violence and sexual harassment is, how to minimise the risk of it occurring, and what to do when incidents occur, or are

alleged to have occurred.

The DfE advice highlights best practice and cross-references other advice, statutory guidance and the legal framework. The school will apply the principles set out in it when considering their approach to sexual violence and sexual harassment between children.

### Key Points

The above guidance:

- stresses the importance of making it clear that sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up
- highlights the risks of tolerating or dismissing any forms of sexual violence or sexual harassment, and encourages early intervention to avoid potential escalation;
- advises on how to embed training and education on these issues within a strong pastoral system, and a planned taught programme across the whole curriculum;
- encourages forums that enable children to talk about issues openly;
- includes a list of possible topics that any taught programme could cover - including consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships;
- advises on how to manage a disclosure, either from the child who has suffered abuse or from other children;
- provides guidance on when to carry out a risk and needs assessment for children affected by sexual violence or sexual harassment;
- provides guidance on initial considerations which schools should take into account when faced with a concern or allegation of sexual violence or sexual harassment - including the age and developmental stages of the children, and any power imbalance between them; and
- provides guidance on difficult scenarios which schools might encounter, for example, how to handle an incident between two pupils which is alleged to have taken place away from school premises.

### **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. Children with Special Educational Needs (SEN) are potentially more vulnerable, and there may be barriers in recognising abuse in this group of children. In addition, children who are perceived by their peers to be LGBT or identify themselves as LGBT may potentially be more vulnerable.

### **Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures.

### **Online safety**

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate filters and monitoring systems are in place to manage the content available to pupils, who can contact our pupils and the personal conduct of our pupils online and have policies in place which pertain specifically to these procedures.

### **Video and Photography at School Events**

Parents are asked to be considerate when taking videos or photographs at school events and are requested not to publish material of other children in any public forum without the permission of the relevant family. It is illegal to sell or distribute recordings from events without permission. Any parent who does not wish for their child to be videoed or photographed at school events by other attendees must notify the school in advance and in writing via email to [karen.marshall@steppingstones.org.uk](mailto:karen.marshall@steppingstones.org.uk)

### **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 the guidance in *Keeping Children Safe in Education (2020)*. Arrangements are overseen by the Employability Team in conjunction with the Headteacher and DSL.

### **Children staying with host families**

In the event that a school trip involved children staying with host families, the school will follow the guidance in Annex E of *Keeping Children Safe in Education (2020)* to ensure that hosting arrangements are as safe as possible.

### **Staff training**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and governors will receive training during their induction, which includes the school's child protection policy and staff behaviour policy, reporting and recording arrangements, and details for the DSL. All staff, volunteers and governors will receive training that is regularly updated. All staff will also receive safeguarding and child protection updates via email, e-bulletins, website access and staff meetings throughout the year.

### **Safer recruitment**

Our school complies with the requirements of [DfE Keeping Children Safe in Education](#) (updated January 2021) and the local safeguarding partner arrangements by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The school's Staff Recruitment policy and procedures sets out the process in full and can be found in our *Recruitment, Selection, Vetting and Volunteering Policy 2020*. A copy can be requested from the school office. At least one member of each recruitment panel will have attended safer recruitment training.

All relevant staff (involved in early years settings and/or before or after school care for children

under eight) are made aware of the disqualification from childcare legislation and their obligations to disclose relevant information to the school.

The school obtains written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work in the school have been appropriately checked and are suitable to work with children.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The school maintains a single central record of recruitment checks undertaken.

### **Abuse of a position of trust**

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under Section 16 of the Sexual Offences Act 2003, it is a criminal offence for a person aged 18 or over to have a sexual relationship with children under 18 where that person is in a position of trust in respect of that child; even if the relationship is consensual or where the person does not teach the child. Such relationships/contact are a serious breach of trust and professional standards even where the pupil is over 18 and regardless of whether or not the pupil consents to that activity. It is also unacceptable for a member of staff to have any kind of sexual or intimate relationships/contact with a pupil of any age in attendance at any other school. Members of staff are also prohibited from forming any kind of sexual or intimate relationships/contact with an individual under the age of 18, who is no longer in school attendance. This forms part of our staff Code of Conduct.

### **Staff/pupil online relationships & communication**

The school provides advice to staff regarding their personal online activity, including in the Code of Conduct, and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation. Staff must only use their own work e mail addresses to communicate with students and students should only contact staff using their own school e mail address. Staff and students should not be in contact on social media and students should not have or use staff personal telephone numbers. The staff Code of Conduct contains full guidance.

### **Low Level Concerns reporting if you have concerns about a colleague/adult in the school**

The school's Low Level Concerns policy enables staff to raise 'low level' concerns which do not constitute allegations of abuse, which should be reported using the Allegations of Abuse Against Staff/Adults policy.

### **Allegations against staff**

Staff who are concerned about the conduct of an adult (staff, volunteer, visitor etc.) towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount.

All concerns of poor practice or possible child abuse by colleagues should be reported to the

headteacher immediately. Complaints about the headteacher/principal should be reported to the chair of governors, chair of the management committee or proprietor.

Staff may also report their concerns directly to children's social care, the Local Authority Designated Officer (LADO) or the police if they believe direct reporting is necessary to secure action.

When an allegation is made against a member of staff, our set procedures must be followed. The full procedures for dealing with allegations against staff can be found in *Keeping Children Safe in Education (DfE, 2020)* and in the school's Allegations of Abuse Against Staff/Adults policy and procedures.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

### **Role of Governors and Safeguarding**

The Governing Body has a duty to ensure that the school meets its statutory responsibilities and ensure that the children and young people attending the school are safe.

The statutory guidance, 'Keeping Children Safe in Education', places statutory requirements on all governing bodies. Governing bodies must make sure their school has policies and procedures in place and take into account any statutory guidance issued by the Secretary of State, any local authority guidance and locally agreed inter-agency procedures.

Governing Bodies will decide for themselves how they organise their strategic and monitoring functions. Although they may decide to allocate individual governors to be responsible for specific areas, eg Safeguarding or Child Protection, it is not statutory that they do so.

Although not a requirement, it is helpful if all governing body members have training about safeguarding, whether the governing body acts collectively or an individual member takes the lead. This will make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

### **Volunteers**

Volunteers, including governors will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised. Volunteers are expected to abide by this policy and the code of conduct and to attend annual safeguarding training in order to visit the school.

### **Contractors**

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

### **Site security**

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and

health and safety regulations. The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

### **Extended school and off-site arrangements**

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own safeguarding and child protection policy and procedures apply.

If other organisations provide services or activities on our site on behalf of our school, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work related activities, our policies and safeguarding procedures still apply.

### **Signposting to further information**

Annex A of KCSIE contains further guidance on a range of specific safeguarding issues, some of which are above. This section must be read by all staff that work directly with children. Any person that has a concern about a child within the school must follow the procedures outlined within this document. If staff have any concerns about a child's welfare, they should act on them immediately. 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.

Annex A of KCSIE contains guidance on the following issues:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Domestic abuse • Homelessness
- So-called 'honour-based' violence
- Preventing radicalisation
- Peer on peer abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting

### **Passing on safeguarding records when a child leaves the school**

Information sharing is vital in identifying and tackling all forms of abuse. When a child leaves the school, it is the responsibility of the DSL to ensure that a copy of their safeguarding records is transferred securely and confidentially to the new school. Before transferring, the DSL will arrange a telephone call with the DSL or Headteacher in the receiving school. Following the conversation, they will arrange for the secure transfer of documentation.

Ensure that an indication of the existence of the additional child protection file is marked on the pupil school file record.

Ensure that when a pupil transfers school (including in-year), their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.

Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.

If the transit method requires that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.

### **Confidentiality, Sharing and Withholding Information**

All matters relating to child protection will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#).

The school will refer to the guidance in the in the data protection: toolkit for schools - <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools> guidance to support schools with data protection activity, including compliance with the GDPR. Information will be shared with staff within the school who 'need to know'.

Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Headteacher or DSLs will only disclose information about a child to other members of staff on a need to know basis.

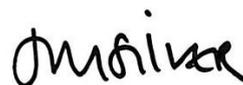
All staff will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

Claire Cookson  
Chair of Governors



Date 1<sup>st</sup> January 2021

Jacqueline Silver  
Headteacher



Date 1<sup>st</sup> January 2021

This policy will be reviewed annually

**Confidential**

**Safeguarding & Child Protection**

**Cause for Concern Reporting Form**

**To be passed directly to the DSL (or the Headteacher or a DDSL in their absence) without delay**

Pass to the Chair of Governors if your concern relates to the Headteacher.

<b>Date &amp; Time of Incident</b>			
<b>Date &amp; Time of Report</b>		<b>Signature</b>	
<b>Name of Person Reporting</b>		<b>Role</b>	
<b>Name of Adult/s Concerned</b>		<b>Role</b>	
<b>Name of Student/s Concerned</b>		<b>Class</b>	
<b>Name of Witnesses</b>		<b>Role/Class</b>	

**Location of Incident**

**Incident Report**

(Continue on a separate page if necessary but indicate here and attach).

Received by:  Name:	DSL / DDSL / Headteacher / Chair of Governors	Signature  Date & Time:	
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## National Contacts

NSPCC 24/7 Helpline Tel: 0808 800 5000 Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) NSPCC Text line 88858

NSPCC Child Line Tel: 0800 1111

NSPCC FGM helpline Tel: 0800 028 3550 Email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

NSPCC Whistleblowing helpline Tel: 0800 028 0285 (8am – 8pm) Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

DfE Prevent helpline for schools & parents Tel: 020 7340 7264 (non-emergency) Email: [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

The Lucy Faithfull Foundation (LFF) Tel: 0800 1000 900 Email: [help@stopitnow.org.uk](mailto:help@stopitnow.org.uk)  
[www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)

National Bullying Helpline Tel: 0845 22 55 787

UK Safer Internet Centre helpline for School Staff Tel: 0844 381 4772 Email: [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)

Internet Watch Foundation hotline for reporting criminal content [www.iwf.org.uk](http://www.iwf.org.uk) Educate Against Hate <http://educateagainsthate.com>

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

## Related safeguarding Policies & Guidance

This policy should be read alongside our other safeguarding policies and staff Code of Conduct.

### Reporting Forms:

- Low Level Concerns
- Allegations of Abuse against Staff/Adults
- Whistleblowing Policy

### Guidance:

- Keeping Children Safe in Education 2020
- statutory guidance Working Together to Safeguard Children;
- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners; and
- departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

A copy of our policies can be requested from the school office.

## Covid-19

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

*The school has a Risk Assessment in place and the Behaviour Policy reflects the CV19 updates around behaviours.*