Kisimul

EDCC02 | Safeguarding and Protecting Children and Vulnerable Young Adults at Calman Colaiste College

Policy and Procedure

Including:

- Safer Recruitment
- Allegations against Staff
- Low-level Concerns

Document Information

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Equality, Diversity & Inclusion Statement

No person or group should suffer oppression or lack of opportunity because of a protected characteristic. Kisimul Group opposes all forms of unlawful discrimination, and we are committed to encouraging equality, diversity, fairness and inclusion in the application of our policies so that everyone has equal access and feels welcome and at ease. To achieve this aim, the application and accessibility of our policies, and the decisions and outcomes arising from our policies, may be monitored to ensure their use is fair, equal and consistent irrespective of any characteristic as may be defined by the Equality Act 2010. This is to ensure that we are listening to people and appropriately understanding their needs, and are tailoring the way we interact and publish or act on our policies to ensure we are promoting equal access and opportunity at all times.

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Important Contacts

ROLE/	NAME	CONTACT DETAILS
ORGANISATION		
Designated Safeguarding	Michael Hayden	01733 271326
Lead (DSL)		07483 077188
Deputy DSL	Huma Jabeen	01733 271326
Peterborough Local	Referral Form:	LADO@peterborough.gov.uk
Authority Designated	www.safeguardingcambspeterboro	01733 864038
Officer (LADO)	ugh.org.uk/children-	01733 864180 (Out of Hours)
	board/professionals/lado/#	
	Managing Allegations:	
	www.safeguardingcambspeterboro	
	ugh.org.uk/children-	
	board/professionals/procedures	
	/managingallegations/	
Peterborough Multi-	Referral Form:	01733 864170
Agency Safeguarding Hub	ehm-childrens-	01733 234724 (Out of Hours)
(MASH)	portal.peterborough.gov.uk/web/p	
	ortal/pages/prosafeguarding#prref	
	<u>erral</u>	
Director of Operational	Nicky Cooper	01522 868279
and Practice Performance		
Group Executive	Paul Routledge	01522 868279
Education Lead		
Head of Therapeutic Lived	Angela Wood	01522 868279
Experience		
Channel/Prevent Multi-		020 7340 7264
Agency Panel Helpline		

1. Aims

The college aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children/young adults' welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance <u>Keeping Children</u> <u>Safe in Education (2024)</u> and <u>Working Together to Safeguard Children (2023)</u>. The college has both children and adult learners with an age range of 16-25, registered as a Specialist post-16 institution. We are aware of our duties to safeguard adult learners and reference their legislative protection under the <u>Skills and Post-16 Education Act 2022</u>. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see <u>Section 3</u>). This policy is also based on the following legislation:

- <u>The School Staffing (England) Regulations 2009</u>, which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in Safer Recruitment techniques.
- The <u>Children Act 1989</u> (and <u>2004 amendment</u>), which provides a framework for the care and protection of children.
- Section 5B(11) of the <u>Female Genital Mutilation Act 2003</u>, as inserted by Section 74 of the <u>Serious Crime Act 2015</u>, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- <u>Statutory quidance on FGM</u>, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The <u>Rehabilitation of Offenders Act 1974</u>, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the <u>Safequarding Vulnerable Groups Act 2006</u>, which defines what "regulated activity" is in relation to children.

- <u>Statutory guidance on the Prevent duty</u>, which explains schools' duties under the <u>Counter-Terrorism and Security Act 2015</u> with respect to protecting people from the risk of radicalisation and extremism.
- The <u>Human Rights Act 1998</u>, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the <u>European Convention on Human Rights (ECHR)</u>.
- The <u>Equality Act 2010</u>, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our Governors and Headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence they're being disproportionately subjected to sexual violence or harassment
- The <u>Public Sector Equality Duty (PSED)</u>, which explains that we must have due regard to
 eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to
 focus on key issues of concern and how to improve pupil outcomes. Some pupils may be
 more at risk of harm from issues such as sexual violence; homophobic, biphobic or
 transphobic bullying, or racial discrimination

3. Definitions

3.1 Safeguarding

Safeguarding and promoting the welfare of children/vulnerable young adults means:

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

3.2 Child protection

Child protection is part of this definition and refers to activities undertaken to protect specific children/young adults who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

3.3 Abuse

Abuse is a form of maltreatment of a child/young person, and may involve inflicting harm or failing to act to prevent harm. **Appendix 1** explains the different types of abuse.

3.4 Neglect

Neglect is a form of abuse and is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

3.5 Sharing of nudes/semi-nudes

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children/young people share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

3.6 Children

Children includes everyone under the age of 18.

3.7 Safeguarding Partners

The following 3 safeguarding partners are identified in *Keeping Children Safe in Education* (and defined in the *Children Act 2004*, as amended by Chapter 2 of the *Children and Social Work Act 2017*). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

3.8 Victim

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way.

When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

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3.9 Perpetrator/alleged perpetrator

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality Statement

Some children and young adults with additional needs have an increased risk of abuse, both online and offline, and additional barriers can exist for some learners with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise learner's diverse circumstances. We ensure that all learners have the same protection, regardless of any barriers they may face. We give special consideration to children/young adults who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see <u>Section 10</u>), which we recognise as applicable to all of our cohort as a SEN provider for autistic and learning disabled children and young people.
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language (EAL).
- Are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after (see <u>Section 12</u>).
- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

5. Roles and Responsibilities

Safeguarding and child/vulnerable adult protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the college and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended college and off-site activities. The college plays a crucial role in preventative education. This is in the context of a whole-college approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny or misandry, homophobia, biphobia, transphobia and sexual violence or harassment. This will be underpinned by our:

- Behaviour policy.
- Therapeutically and trauma informed approaches, outlined in individual plans for care support, communication and education of young people.
- Planned programme of relationships, sex and health education (RSHE), which is inclusive
 and delivered regularly, and adapted and personalised to ensure accessibility for all
 learners and those with a range of learning disabilities, tackling issues such as:
 - Healthy and respectful relationships.
 - Boundaries and consent.
 - Stereotyping, prejudice and equality.
 - Body confidence and self-esteem.
 - How to recognise an abusive relationship (including coercive and controlling behaviour).
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable.

5.1 All Staff

5.1.1 Staff who work directly with children are expected to read at least Part 1 of *Keeping Children Safe in Education (KCSIE)*.

5.1.2 All staff will:

 Read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance Keeping Children Safe in Education, and review this guidance at least annually.

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- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents and carers.
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

5.1.3 All staff will be aware of:

- Our systems that support safeguarding, including this policy, the staff code of conduct, the
 role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour
 policy, and the safeguarding response to children who go missing from education.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused
 or neglected, including specific issues such as FGM, and how to maintain an appropriate
 level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children/vulnerable young adults can be at risk of harm inside and outside of their home, at school and online.

- The fact that children /vulnerable young adults who are (or who are perceived to be)
 lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children/adults.
- That a child/vulnerable young adult and their family may be experiencing multiple needs at the same time.
- What to look for to identify children/vulnerable young adults who need help or protection .
- <u>Section 16</u> of this policy outlines in more detail how staff are supported to do this.

5.2 The Designated Safeguarding Lead (DSL)

- **5.2.1** The DSL is a member of the Senior Leadership team. Our DSLs are Michael Hayden and Huma Jabeen (Deputy DSL). Our visual contact sheet at <u>Appendix 3</u> outlines the key people and deputies and other sources of contact and advice for the college.
- **5.2.2** The DSL takes lead responsibility for child protection and wider safeguarding in the college. This includes online safety, and understanding our filtering and monitoring processes on school devices and college networks to keep learners safe online.
- **5.2.3** During term time, the DSL will be available during college hours for staff to discuss any safeguarding concerns. A list of <u>Important Contacts</u> for advice is included at the start of this policy should they not be contactable, and outlined in the visual contact sheet at <u>Appendix 3</u> and which is displayed in the reception area.
 - **5.2.4** When the DSL is absent, the Deputy DSL Huma Jabeen will act as cover.
- **5.2.5** If the DSL and Deputies are not available, Paul Routledge or Nicky Cooper can be contacted directly for advice. This line of reporting is outlined on the visual contact sheet at **Appendix 3**.
 - **5.2.6** The DSL will be given the time, funding, training, resources and support to:
 - Provide advice and support to other staff on child welfare and child protection matters.
 - Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
 - Contribute to the assessment of children/vulnerable young adults.
 - Refer suspected cases, as appropriate, to the relevant body (e.g. local authority children's social care, Channel programme, Disclosure and Barring Service, police), and support staff who make such referrals directly.
 - Have a good understanding of harmful sexual behaviour.
 - Have a good understanding of the filtering and monitoring systems and processes.

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• Organise appropriate Prevent training for staff.

5.2.7 The DSL will also:

- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the college's policies.
- Be confident that they know what local specialist support is available to support all
 children and vulnerable young adults involved (including victims and alleged perpetrators)
 in sexual violence and sexual harassment, and be confident as to how to access this
 support.
- Be aware that children must have an "appropriate adult" to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and their Deputies are set out in their job description.

5.3 The Executive Board

5.3.1 The executive board will:

- Facilitate a whole-college approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation.
- Be aware of its obligations under the *Human Rights Act 1998*, the *Equality Act 2010* (including the *Public Sector Equality Duty*), and our school's local multi-agency safeguarding arrangements.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated.
- Ensure that there is scrutiny and quality assurance of the effectiveness of safeguarding
 processes through an effective reporting and governance review process, including analysis
 of incidents, open cases and staff training.
- Ensure that the college has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:

- Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff
 and service providers what needs to be done to support the school in meeting
 these standards.

Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
- The college has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- That this policy reflects that children/vulnerable young adults with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.

The Group Executive Education Lead will act as the "case manager" in the event that an allegation of abuse is made against the Headteacher, where appropriate (see Appendix 3 for contact details).

5.4 The Headteacher

5.4.1 The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems that support safeguarding, including this policy, as part of their induction.

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- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that they allocate sufficient time and review their priorities to ensure oversight of safeguarding as site based DSLs, alongside Headteacher responsibilities.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see <u>Appendix 3</u>).
- Making decisions regarding all low-level concerns, ensuring that they seek advice from Kisimul Group Executives and HR Business Partners as required to ensure objectivity and wider perspectives.

5.5 Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, such as DSLs, Special Educational Needs Co-ordinators (SENCOs), social workers, mental health leads and others.

6. Confidentiality

- **6.1.1** Timely information sharing is essential to effective safeguarding.
- **6.1.2** Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- **6.1.3** The *Data Protection Act 2018* and the *UK GDPR* do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- **6.1.4** If staff need to share "special category personal data", the *Data Protection Act 2018* contains "safeguarding of children and individuals at risk" as a processing condition that allows practitioners to share information without consent if:
 - It is not possible to gain consent
 - It cannot be reasonably expected that a practitioner gains consent
 - If to gain consent would place a child at risk
- **6.1.5** Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

6.1.6 If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing
 information, staff may still lawfully share it if there's another legal basis under the Data
 Protection Act 2018 or UK GDPR that applies.
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

6.1.7 The DSL should consider that:

- Parents or carers should normally be informed, unless this would put the victim at greater risk.
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault
 by penetration or sexual assault is made, this should be referred to the police. While the
 age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting
 principle of referring to the police remains.

6.1.8 Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- Do all they reasonably can to protect the anonymity of any children/vulnerable young adults involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved.
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- **6.1.9** The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- **6.1.10** If staff are in any doubt about sharing information, they should speak to the DSL or their Deputy.

Confidentiality is also addressed in this policy with respect to record-keeping in **Section 15**, and allegations of abuse against staff in **Section 7.7**.

7. Recognising Abuse and Taking Action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled.
- Has special educational needs (whether or not they have a statutory Education, Health and Care plan (EHCP)).
- Is a young carer.
- Is bereaved.
- Is showing signs of being drawn into anti-social or criminal behaviour, including being
 affected by gangs and county lines and organised crime groups and/or serious violence,
 including knife crime.
- Is frequently missing/goes missing from education, care or home.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Is misusing drugs or alcohol.
- Is suffering from mental ill health.
- Has returned home to their family from care.
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage.
- Is a privately fostered child.
- Has a parent or carer in custody or is affected by parental offending.
- Is missing education, or persistently absent from school, or not in receipt of full-time education.
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded.

Staff must follow the procedures set out below in the event of a safeguarding issue.

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Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

7.1 If a child/vulnerable young adult is suffering or likely to suffer harm, or in immediate danger

- **7.1.1** The DSLs are there to offer advice and guidance to staff and visitors in the event that there is a child or vulnerable adult at risk, and they or their deputies, or additional reporting layers as outlined on the contact sheet at Appendix 3, will be available for contact. However, do not hesitate to make a referral to local authority children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.
- **7.1.2** Tell the DSL (see <u>Section 5.2</u>) as soon as possible if you make a referral directly. Links to the referral forms are under <u>Important Contacts</u> at the beginning of this policy.

7.2 If a child/vulnerable young adult makes a disclosure to you

- **7.2.1** If a child /vulnerable young adult discloses a safeguarding issue to you, you should:
- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child/young adult they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts,
 and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a
 referral to local authority children's social care and/or the police directly (see 7.1), and tell
 the DSL as soon as possible that you have done so. Aside from these people, do not
 disclose the information to anyone else unless told to do so by a relevant authority
 involved in the safeguarding process
- **7.2.2** Bear in mind that some children/vulnerable young adults may:
- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful.

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 Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop staff from having a professional curiosity and speaking to the DSL regarding any concerns about the welfare of a child or young person.

7.3 If you discover that FGM has taken place, or that a learner is at risk of FGM

- **7.3.1** Keeping Children Safe in Education explains that Female Genital Mutilation (FGM) comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- **7.3.2** FGM is illegal in the UK and is a form of child abuse with long-lasting, harmful consequences. It is also known as "female genital cutting", "circumcision" or "initiation".
- **7.3.3** Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in <u>Appendix 2</u> of this policy.

7.3.4 Any teacher who:

- Is informed by a girl under 18 that an act of FGM has been carried out on her
- Observes physical signs which appear to show that an act of FGM has been carried out on a
 girl under 18 and they have no reason to believe that the act was necessary for the girl's
 physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

- **7.3.5** Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority children's social care as appropriate.
- **7.3.6** Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow local safeguarding procedures.
- **7.3.7** The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM, or where FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- **7.3.8** Any member of staff who suspects a pupil is at risk of FGM, suspects that FGM has been carried out, or discovers that a pupil aged 18 or over appears to have been a victim of FGM, should speak to the DSL and follow local safeguarding procedures.

- 7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)
- **7.4.1 Figure 1** below illustrates the procedure to follow if you have any concerns about a child's welfare.
 - **7.4.2** Where possible, speak to the DSL first to agree a course of action.
- **7.4.3** If the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
- **7.4.4** Make a referral to local authority children's social care directly, if appropriate (see **Referral** below). Share any action taken with the DSL as soon as possible.

Early help assessment

- **7.4.5** If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
- **7.4.6** We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
- **7.4.7** The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Early Help and Targeted Support | Peterborough City Council

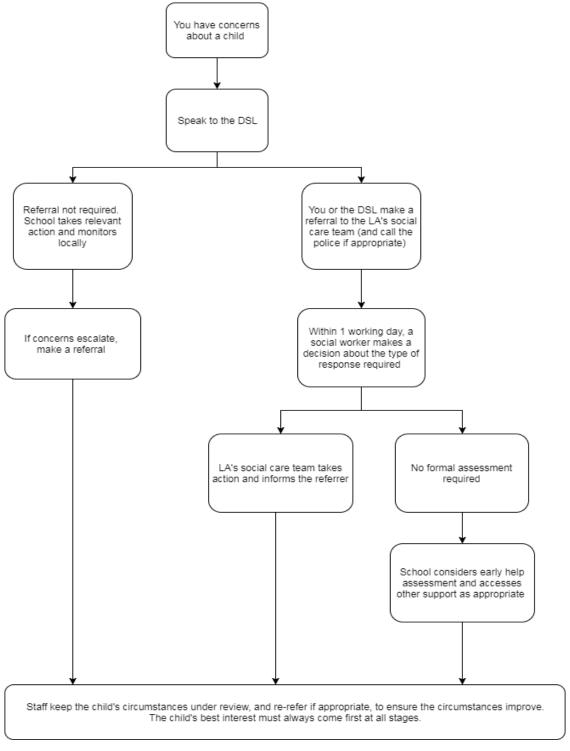
Referral

- **7.4.8** If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
- **7.4.9** If you make a referral directly (see <u>Section 7.1</u>), you must tell the DSL as soon as possible.
- **7.4.10** The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

7.4.11 If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Make a children's social care complaint | Peterborough City Council

Figure 1 - Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)



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7.5 If you have concerns about extremism

- **7.5.1** If a child or vulnerable young adult is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- **7.5.2** If the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see <u>Section</u> **7.4**). Inform the DSL or deputy as soon as practically possible after the referral.
- **7.5.3** Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.
- **7.5.4** The DfE also has a dedicated telephone helpline, 020 7340 7264, which college staff can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
 - **7.5.5** Call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 - Think someone is in immediate danger
 - Think someone may be planning to travel to join an extremist group
 - See or hear something that may be terrorist-related

7.6 If you have a concern about mental health

- **7.6.1** 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. While our young people have complex presentation this should never mask us having an open minded and inquisitive approach to whether presentation or symptoms may be linked to negative mental health.
- **7.6.2** Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
- **7.6.3** If you have a mental health concern about a child/vulnerable young adult that is also a safeguarding concern, take immediate action by following the steps in <u>Section 7.4</u>.
- **7.6.4** If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action. The Group Therapeutic Lead can also be contacted for signposting and advice in respect of clinical support or intervention in the first instance.

7.7 Concerns about a staff member, supply staff, volunteer or contractor

- **7.7.1** If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, **speak to the Headteacher as soon as possible**. If the concerns/allegations are about the Headteacher, speak to the Group Executive Education Lead or a Director.
- **7.7.2** Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).
- **7.7.3** If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Learning Lessons

- **7.7.4** After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):
 - Issues arising from the decision to suspend the member of staff
 - The duration of the suspension
 - Whether or not the suspension was justified
 - The use of suspension when the individual is subsequently reinstated. We will consider
 how future investigations of a similar nature could be carried out without suspending the
 individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent Allegations

- **7.7.5** Abuse can be reported, no matter how long ago it happened.
- **7.7.6** We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
- **7.7.7** Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Concerns which do not meet the harm threshold

7.7.8 This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in <u>Section 7.1</u>. Concerns may arise through, for example:

- Suspicion.
- Complaint.
- Safeguarding concern or allegation from another member of staff.
- Disclosure made by a child, parent or other adult within or outside the school.
- Pre-employment vetting checks.

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of Low-Level Concerns

7.7.9 The term "low-level concern" is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.
- **7.7.10** Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children.
- Having favourites.
- Taking photographs of children/vulnerable young adults on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating pupils.

Sharing low-level concerns

- **7.7.11** We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately. We will create this culture by:
 - Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
 - Empowering staff to share any low-level concerns.

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- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Helping to identify any weakness in the school's safeguarding system.

Responding to low-level concerns

- **7.7.12** If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:
 - Directly to the person who raised the concern, unless it has been raised anonymously.
 - To the individual involved and any witnesses.
 - The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the college's code of conduct. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record Keeping

- **7.7.13** All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Records will be:
 - Kept confidential, held securely and comply with the Data Protection Act 2018 and UK GDPR.
 - Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in Section
 7.1, we will refer it to the LADO.
 - Retained at least until the individual leaves employment at the school.
- **7.7.14** Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

7.7.15 We will not include low-level concerns in references unless:

- Any concerns met the threshold for referral to the designated officer at the local authority and is found to be substantiated.
- Any concerns relate to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

7.8 Allegations of abuse made against other pupils

- **7.8.1** We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.
- **7.8.2** Most cases of learners hurting other learners will be dealt with under our college's behaviour policy, but this policy will apply to any allegations that raise safeguarding concerns.
- **7.8.3** Given the complex needs of the young people in the college, additional context around intent or capacity may need to be considered, but safeguarding concerns might include instances where the alleged behaviour:
 - Is serious, and potentially a criminal offence.
 - Could put learners in the college at serious risk.
 - Is violent.
 - Involves learners being forced to use drugs or alcohol.
 - Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent
 exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including
 the sharing of nudes and semi-nudes, see <u>Section 7.9</u>).

Procedures for dealing with allegations of child-on-child abuse

7.8.4 If a learner makes an allegation of abuse against another learner:

- You must record the allegation and tell the DSL, but do not investigate it.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children/vulnerable young adults involved (including the victim(s), the alleged perpetrator(s) and any others affected) with a named person they can talk to if needed. This will include considering transport as a potentially vulnerable place for the victim(s) or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

- **7.8.5** If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- **7.8.6** We will take a multi-disciplinary approach to resolving issues that occur, including consideration of capacity, need for additional input and support, clinical approaches, facilitating effective communication and updating risk assessments for each young person. Where this may include considerations on viability of placements due to overt risks and reasonable mitigations not being sufficient, the Group Executive Education Lead and Director of Operational Practice and Partnerships Director will lead on decision making.

Creating a supportive environment in the college and minimising the risk of child-on-child abuse

- **7.8.7** We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents. To achieve this, we will:
 - Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
 - Be vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or "hazing"-type violence with respect to boys.
 - Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
 - Ensure pupils are able to easily and confidently report abuse using our reporting systems
 (as described in <u>Section 7.10</u> below), including access to augmentative communication
 support such as visual references.
 - Ensure staff reassure victims that they are being taken seriously.
 - Be alert to reports of sexual violence and/or harassment that may point to environmental
 or systemic problems that could be addressed by updating policies, processes and the
 curriculum, or could reflect wider issues in the local area that should be shared with
 safeguarding partners.
 - Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim(s), alleged perpetrator(s) and any witnesses are not bullied or harassed.

- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening staff should maintain an attitude of "it could happen here".
 - That if they have any concerns about a child/vulnerable young adults welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children/young adults can show signs or act in ways they hope adults will notice and react to.
 - A friend may make a report.
 - A member of staff may overhear a conversation.
 - A learner's behaviour might indicate that something is wrong.
 - That certain children/vulnerable young adults may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
 - That a learner harming a peer could be a sign that the perpetrator is being abused themselves, and that this would fall under the scope of this policy.
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
 - That they should speak to the DSL if they have any concerns.
 - While typically we would not anticipate the majority of our learners accessing social
 media habitually given their developmental delay, we should be aware that social
 media is likely to play a role in the fall-out from any incident or alleged incident,
 including for potential contact between the victim(s), alleged perpetrator(s) and
 friends from either side.
- **7.8.8** The DSL will take the lead role in co-ordinating a response in respect of the alleged perpetrator(s).

7.9 Sharing of nudes and semi-nudes (or "sexting")

Your responsibilities when responding to an incident

- **7.9.1** If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computergenerated images that otherwise appear to be a photograph or video (also known as "sexting" or "youth-produced sexual imagery"), you must report it to the DSL immediately. You must **not**:
 - View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
 - Delete the imagery, or ask the pupil to delete it.
 - Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery, as this is the DSL's responsibility.
 - Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
 - Say or do anything to blame or shame any young people involved.
- **7.9.2** You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial Review Meeting

- **7.9.3** Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
 - Whether there is an immediate risk to pupil(s).
 - If a referral needs to be made to the police and/or children's social care.
 - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
 - What further information is required to decide on the best response.
 - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
 - Whether immediate action should be taken to delete or remove images or videos from devices or online services.
 - Any relevant facts about the learners involved which would influence risk assessment.

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- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved).
- **7.9.4** The DSL will make an immediate referral to police and/or children's social care if:
- The incident involves an adult. Where an adult poses as a child to groom or exploit a child
 or young person, the incident may first present as a child-on-child incident. See <u>Section 7.7</u>
 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN).
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any pupil in the images or videos is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or selfharming).
- **7.9.5** If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further Review by the DSL

- **7.9.6** If, at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.
 - **7.9.7** They will hold interviews with the learners involved (if appropriate).
- **7.9.8** If at any point in the process there is a concern that a child/vulnerable young adult has been harmed or is at risk of harm, a referral will be made to social care and/or the police immediately.

Informing parents/carers

7.9.9 The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

7.9.10 If it is necessary to refer an incident to the police, this will be done without delay.

Peterborough Information Network | Recognising Abuse and Reporting Concerns (Adults)

How to report possible child abuse | Cambridgeshire Constabulary (cambs.police.uk)

Recording Incidents

7.9.11 All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in <u>Section 14</u> of this policy also apply to recording these incidents.

Curriculum Coverage

- **7.9.12** Learners are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education input. Consideration for the developmental understanding of each young person will inform the level of information and pedagogy used. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
 - What it is.
 - Public and private information and an understanding of boundaries and consent.
 - How it is most likely to be encountered.
 - The consequences of requesting, forwarding or providing such images, including when it is and is not abusive, and when it may be deemed as online sexual harassment.
 - Issues of legality.
 - The risk of damage to people's feelings and reputation.
 - **7.9.13** Pupils also learn the strategies and skills needed to manage:
 - Specific requests or pressure to provide (or forward) such images.
 - The receipt of such images.
- **7.9.14** This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.
 - **7.9.15** Teaching follows best practice in delivering safe and effective education, including:
 - Putting safeguarding first.
 - Approaching from the perspective of the child/vulnerable young adult.
 - Promoting dialogue and understanding.
 - Empowering and enabling children and young people.
 - Never frightening or scare-mongering.
 - Challenging victim-blaming attitudes.

7.10 Reporting systems for our learners

- **7.10.1** Where there is a safeguarding concern, we will take the learner's wishes and feelings into account when determining what action to take and what services to provide.
- **7.10.2** We recognise the importance of ensuring learners feel safe and comfortable to come forward and report any concerns and/or allegations. To achieve this, we will:
 - Put systems in place for pupils to confidently report abuse.
 - Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils.
 - Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- **7.10.3** We provide visual information to pupils in respect of expressing how they are feeling, and what to do if they are worried. We work in a variety of ways to glean information about learner's views, including those of non-verbal communicators, and may use signing or other symbolised systems including the use of social stories to outline information and try and encourage self-advocacy and feedback.

8. Online Safety and the use of Mobile Technology

8.1 Introduction

- **8.1.1** We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our school aims to:
 - Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors.
 - Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (i.e. mobile phones).
 - Set clear guidelines for the use of mobile phones for the whole school community.
 - Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns,
 where appropriate.

8.2 Key Categories of Risk

Our approach to online safety is based on addressing the following 4 key categories of risk:

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

8.3 Addressing Key Risks

To meet our aims and address the risks above, we will:

- **8.3.1** Educate learners about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology.
- Keeping personal information private.
- How to recognise unacceptable behaviour online.
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim.
- **8.3.2** Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- **8.3.3** Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present.
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- **8.3.4** Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.
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- **8.3.5** Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk from the school's IT systems.
- **8.3.6** Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- **8.3.7** Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

9. Notifying Parents or Carers

- **9.1.1** Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
- **9.1.2** Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
- **9.1.3** If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- **9.1.4** In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
 - **9.1.5** The DSL will, along with any relevant agencies (decided on a case-by-case basis):
 - Meet with the victim's parents or carers, alongside the victim, to discuss what's being put
 in place to safeguard them, and to understand their wishes in terms of what support they
 may need and how the report will be progressed.
 - Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reasoning behind any decisions.

10. Learners with Special Educational Needs, Disabilities or Health Issues

10.1.1 We recognise that within our school pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

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- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in college or the consequences of doing so..
- 10.1.2 We recognise that developmentally our young people do not typically have the cognitive capacity to independently access and utilise technology without supervised support, and this provides a protective layer in respect of insulating young people against harm or inappropriate content. However, we should never be complacent, and must recognise that this makes them very vulnerable or susceptible to not recognising risks or to determining whether content is suitable or appropriate.

11. Learners with a Social Worker

- **11.1.1** Learners may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- **11.1.2** The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
- **11.1.3** Where we are aware that a learner has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the learner's safety, welfare and educational outcomes. For example, it will inform decisions about:
 - Responding to unauthorised absence or missing education where there are known safeguarding risks.
 - The provision of pastoral and/or academic support.
 - An increase in behavioural presentation or incident reporting.

12. "Looked-After" and "Previously Looked-After" Children

- **12.1.1** We will ensure that staff have the skills, knowledge and understanding to keep lookedafter children and previously looked-after children safe. In particular, we will ensure that:
 - Appropriate staff have relevant information about children/young adult's looked-after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
 - The DSL has details of children's/young adult's social workers and relevant Virtual School Heads.
- **12.1.2** The Assistant Headteachers take the lead on promoting the educational achievement of looked-after and previously looked-after children. However, given the majority of our children reside in the Group's children's homes, the class teachers will take the lead in target setting and planning personalised education pathways for pupils in their care.

12.1.3 All teachers will, as part of their roles:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with Virtual School Heads to promote the educational achievement of looked-after and previously looked-after children through provision of Personal Education Plans where required.

13. Learners who are Lesbian, Gay, Bisexual or Gender-questioning

- **13.1.1** We recognise that learners who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.
- **13.1.2** We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.
- **13.1.3** When families/carers are making decisions about support for gender-questioning learners, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.
- **13.1.4** When supporting a gender-questioning student, we will take a cautious approach as there are still unknowns around the impact of social transition, and a student may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, be autistic, or may have attention and processing challenges such as attention deficit hyperactivity disorder (ADHD).
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- **13.1.5** We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.
- **13.1.6** Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

14. Complaints and Concerns

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our Managing Allegations Policy.

14.2 Other complaints

Our Complaints Policy outlines processes for dealing with complaints and concerns, including management of complaints and appeals.

14.3 Whistle-blowing

Our Group Whistle-blowing Policy and Procedure should be referenced if staff, visitors or any stakeholders wish to raise a specific concern anonymously or have concerns about culture.

15. Record Keeping

- 15.1.1 We will hold records in line with our Record Keeping and Archiving Policy.
- **15.1.2** All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

15.1.3 Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.
- **15.1.4** Concerns and referrals will be kept in a separate child protection file for each child.

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- **15.1.5** Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- **15.1.6** Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- **15.1.7** If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
- **15.1.8** To allow the new school/college to have support in place when the child arrives, this should be within 5 days for an in-year transfer, or within the first 5 days of the start of a new term.
- **15.1.9** If the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- **15.1.10** The school uses an online recording portal (Radar) to record and hold information in respect of individual records; access is granted according to role and need to view/access information.

16. Training Requirements

16.1 All staff

- **16.1.1** All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
 - **16.1.2** This training will be regularly updated and will:
 - Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
 - Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
 - Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment.
 - Have a clear understanding of the needs of all students.

- **16.1.3** All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.
- **16.1.4** Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins, bitesize training and staff meetings).

16.2 The DSL and Deputies

- **16.2.1** The DSL and (deputies) will undertake child protection and safeguarding training at least every 2 years.
- **16.2.2** In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- **16.2.3** They will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

16.3 Executive Board

- **16.3.1** The Executive team and governance oversight of the school includes reporting and feedback in respect of safeguarding and child protection (including online safety) which is regularly updated. This includes incident breakdown and analysis, updates on training and input provided and headline data on numbers of open safeguarding cases or external referrals. This is to make sure that they can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.
- **16.3.2** As the Group Executive Education Lead for the group may be required to act as the "case manager" in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

16.4 Interview Panels

16.4.1 At least 1 person conducting an interview for any post at the college will have undertaken Safer Recruitment training. This will cover, as a minimum, the contents of *Keeping Children Safe in Education*, and will be in line with local safeguarding procedures. See *HR01 Safer Recruitment Policy* for further details.

17. Monitoring Compliance

This policy will be reviewed annually by the Group Executive Education Lead. At every review, it will be approved by the Group's policy committee and approved.

18. Linked Documents

Appendix 1 – Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

1. Physical Abuse

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

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

Emotional abuse 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.
- Not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may
 include interactions that are beyond a child's developmental capability, as well as
 overprotection and limitation of exploration and learning, or preventing the child
 participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

3. 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 nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- 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

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inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

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

4. 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 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 or ensure adequate supervision, including the use of inadequate care-givers.
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2 – Specific Safeguarding Issues

1. Assessing adult-involved nude and semi-nude sharing incidents

1.1 Introduction

This section is based on Annexe A of the UK Council of Internet Safety's *Advice for Education Settings*.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

1.2 Sexually motivated incidents

- **1.2.1** In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.
- 1.2.2 To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including Algenerated material.
- **1.2.3** Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.
- **1.2.4** Potential signs of adult-involved grooming and coercion can include the child or vulnerable young adult being:
 - Contacted by an online account that they do not know but appears to be another child or young person.
 - Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images.

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- Moved from a public to a private/E2EE platform.
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes.
- Offered something of value such as money or gaming credits.
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort "real" images.

1.3 Financially motivated incidents

- **1.3.1** Financially motivated sexual extortion (often known as "sextortion") is an adult-involved incident in which an adult offender (or multiple offenders) threatens to release nudes or seminudes of a child or young person unless they pay money or do something else to benefit them.
- **1.3.2** Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.
- **1.3.3** Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:
 - Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them.
 - Use images that have been stolen from the child or young person taken through hacking their account.
 - Use digitally manipulated images, including Al-generated images, of the child or young person.
 - The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.
- **1.3.4** Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:
 - Contacted by an online account that they do not know, but which appears to be another child or young person. They may be contacted by a hacked account of a child or young person.
 - Quickly engaged in sexually explicit communications, which may include the offender sharing an image first.
 - Moved from a public to a private/E2EE platform.

- Pressured into taking nudes or semi-nudes.
- Told they have been hacked and they have access to their images, personal information and contacts.
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person.

2. Children who are Absent from Education

- **2.1.1** A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation, or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.
- **2.1.2** There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:
 - Are at risk of harm or neglect.
 - Are at risk of forced marriage or FGM.
 - Come from Gypsy, Roma, or Traveller families.
 - Come from the families of service personnel.
 - Go missing or run away from home or care.
 - Are supervised by the youth justice system.
 - Cease to attend a school.
 - Come from new migrant families.
- **2.1.3** We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
- **2.1.4** Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

2.1.5 If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

3. Child Criminal Exploitation

- **3.1.1** Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
- **3.1.2** The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- **3.1.3** The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact, and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (in so-called "county lines" operations), forced to shoplift or pickpocket, or to threaten other young people. Indicators of CCE can include a child:
 - Appearing with unexplained gifts or new possessions.
 - Associating with other young people involved in exploitation.
 - Suffering from changes in emotional wellbeing.
 - Misusing drugs and alcohol.
 - Going missing for periods of time or regularly coming home late.
 - Regularly missing school or education.
 - Not taking part in education.
- **3.1.4** If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

4. Child Sexual Exploitation

- **4.1.1** Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.
- **4.1.2** The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
- **4.1.3** The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser, and may be tricked into believing they are in a loving, consensual relationship.
- **4.1.4** CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.
 - **4.1.5** In addition to the CCE indicators above, indicators of CSE can include a child:
 - Having an older boyfriend or girlfriend
 - Suffering from sexually transmitted infections or becoming pregnant
- **4.1.6** If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

5. Child-on-child abuse

- **5.1.1** Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.
- **5.1.2** Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.
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- **5.1.3** Child-on-child abuse is most likely to include, but may not be limited to:
- Bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- Abuse in intimate personal relationships between children, sometimes known as "teenage relationship abuse"
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence, such as rape, assault by penetration and sexual assault this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos, also known as "sexting" or "youth-produced sexual imagery".
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation or "hazing"-type violence and rituals this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- **5.1.4** Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.
- **5.1.5** If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in <u>Section 7</u> of this policy, as appropriate. In particular, <u>Section 7.8</u> and <u>Section 7.9</u> set out more detail about our school's approach to this type of abuse.
- **5.1.6** When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.
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6. Domestic abuse

- **6.1.1** Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- **6.1.2** Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
- **6.1.3** Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.
- **6.1.4** Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.
- **6.1.5** If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the DSL) before the child or children arrive at school the following day via Operation Encompass: https://www.operationencompass.org/
- **6.1.6** The DSL will provide support according to the student's needs and update records about their circumstances.

7. Homelessness

- **7.1.1** Being homeless or being at risk of becoming homeless presents a real risk to a child's/vulnerable young adults welfare.
- **7.1.2** The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures):

https://www.peterborough.gov.uk/residents/housing/homelessness

- **7.1.3** Where a child has been harmed, or is at risk of harm, the DSL will also make a referral to local authority children's social care.
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8. "Honour-based Abuse", including Female Genital Mutilation and Forced Marriage

8.1 HBA

- **8.1.1** So-called "honour-based" abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
- **8.1.2** Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
- **8.1.3** All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

8.2 FGM

- **8.2.1** The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.
- **8.2.2** Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out, or suspects that a pupil is at risk of FGM.
 - **8.2.3** Indicators that FGM has already occurred include:
 - A pupil confiding in a professional that FGM has taken place.
 - A mother/family member disclosing that FGM has been carried out.
 - A family/pupil already being known to social services in relation to other safeguarding issues.
 - A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable.
 - Finding it hard to sit still for long periods of time, where this was not a problem previously.
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating.
 - Having frequent urinary, menstrual or stomach problems.
 - Avoiding physical exercise or missing PE.
 - Being repeatedly absent from school, or absent for a prolonged period.
 - Demonstrating increased emotional and psychological needs for example,
 withdrawal or depression, or significant change in behaviour.

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- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

8.2.4 Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM this is the biggest risk factor to consider.
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other), or already being known to social care in relation to other safeguarding issues.
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM.
 - Having limited level of integration within UK society.
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
 - Talking about a long holiday to her country of origin or another country where the
 practice is prevalent, or parents/carers stating that they or a relative will take the
 girl out of the country for a prolonged period.
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
 - Talking about FGM in conversation for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
 - Being unexpectedly absent from school.
 - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

8.3 Forced marriage

8.3.1 Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

- **8.3.2** It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.
- **8.3.3** Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.
- **8.3.4** If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:
 - Speak to the pupil about the concerns in a secure and private place.
 - Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
 - Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
 - Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

9. Preventing radicalisation

9.1 Definitions

- **9.1.1** Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.
- **9.1.2** Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 - Negate or destroy the fundamental rights and freedoms of others.
 - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights.
 - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points.

9.1.3 Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism 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.

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9.2 Identifying and Preventing Radicalisation

- **9.2.1** Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.
- **9.2.2** We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
- **9.2.3** We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.
- **9.2.4** There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.
 - **9.2.5** Staff will be alert to changes in pupils' behaviour.
- **9.2.6** The government website <u>Educate Against Hate</u> and charity <u>NSPCC</u> say that signs that a pupil is being radicalised can include:
 - Refusal to engage with, or becoming abusive to, peers who are different from themselves.
 - Becoming susceptible to conspiracy theories and feelings of persecution.
 - Changes in friendship groups and appearance.
 - Rejecting activities they used to enjoy.
 - Converting to a new religion.
 - Isolating themselves from family and friends.
 - Talking as if from a scripted speech.
 - An unwillingness or inability to discuss their views.
 - A sudden disrespectful attitude towards others.
 - Increased levels of anger.
 - Increased secretiveness, especially around internet use.
 - Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
 - Accessing extremist material online, including on Facebook or Twitter.
 - Possessing extremist literature.
 - Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

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- **9.2.7** Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour staff should have confidence in their instincts and seek advice if something feels wrong.
- 9.2.8 If staff are concerned about a pupil, they will follow our procedures set out in <u>Section</u>7.5 of this policy, including discussing their concerns with the DSL.
 - **9.2.9** Staff should **always** take action if they are worried.

10. Sexual Violence and Sexual Harassment between Children/Young Adults in College

10.1.1 Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex.
- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face to face (both physically and verbally).
- **10.1.2** Sexual violence and sexual harassment exist on a continuum and may overlap.
- **10.1.3** Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same education provision.
- **10.1.4** If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

10.1.5 When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.

- Consider if there are wider cultural issues within the college that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs.
- **10.1.6** Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.
 - **10.1.7** Staff should be aware of the importance of:
 - Challenging inappropriate behaviours.
 - Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
 - Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms,
 breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or
 tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in <u>Section 7</u> of this policy, as appropriate. In particular, <u>Sections 7.8</u> and <u>7.9</u> set out more detail about our school's approach to this type of abuse.

11. Serious Violence

- **11.1.1** Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
 - Increased absence from school.
 - Change in friendships or relationships with older individuals or groups.
 - Significant decline in performance.
 - Signs of self-harm or a significant change in wellbeing.
 - Signs of assault or unexplained injuries.
 - Unexplained gifts or new possessions, which could indicate that the child has been
 approached by, or is involved with, individuals associated with criminal networks or gangs
 and may be at risk of criminal exploitation (see <u>Appendix 2.3</u>).
 - 11.1.2 Risk factors which increase the likelihood of involvement in serious violence include:
 - Being male.

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- Having been frequently absent or permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.
- **11.1.3** Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or being at risk of, serious violence, they will report this to the DSL.

12. Checking the identity and suitability of visitors

- **12.1.1** All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.
- **12.1.2** If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
 - **12.1.3** Visitors are expected to sign the visitors' book and wear a visitor's badge.
- **12.1.4** Visitors to the school who are visiting for a professional purpose, and who would be engaged in regulated activity such as educational psychologists and working on service level or consultant basis, will be asked to show photo ID and either:
 - Will be asked to show their DBS certificate, which will be checked alongside their photo ID
 - The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)
- **12.1.5** All other visitors should be accompanied by a member of staff at all times. We will not invite into the college any speaker who is known to disseminate extremist views. We do not allow the use of college premises by external organisations (such as sporting activity or adult education).

13. Non-collection of children

13.1.1 If a child/young adult is not collected at the end of the day, we will:

- Ensure that arrangements are made for the safe supervision of the child/young person on the school premises.
- Contact parents/carers or use emergency contact/transport services as appropriate information and gain context for the situation.
- Liaise with parents/carers or emergency contact for the safe transportation of the child.
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- Contact social services should there be concerns in respect of the welfare of the child or young person, there is no contactable responsible adult, or there is a repeated pattern of non-collection beyond a one-off circumstance.
- Record the incident on the child/young person welfare concern form on Radar.

14. Missing learners

- **14.1.1** Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:
 - Ensure that staff search the immediate area and are contactable on mobile phones.
 - If the child/young person is out of line of sight and is not located after 5 minutes then we will contact the police and give details of the young person, appearance, last location they were seen and an outline of their additional needs.
 - Contact parents/carers and explain the situation and actions undertaken for safe return and care.
 - If the young person has not returned by the end of the school day, social services (EDT) should be called to outline the situation and provide context.
 - Following resolution and safe return of the young person, an incident report should be completed on Radar and a de-brief including the senior management team should be completed. The young person's risk assessment should be updated and include any triggers and presentation that would indicate a possible repetition.
 - **14.1.2** The DSL and Headteacher should oversee and co-ordinate the processes above.

Appendix 3 – Safeguarding Contact Details

Calman Colaiste



Learning for Life All paperwork can be found in the Safeguarding

Folder in the Office

If unavailable:

Safeguarding Children and Adults at Risk Procedure

Whistleblowing Policy – Policy Folder

Designated Safeguarding Lead

Michael Hayden: Head of College

Tel: 01733 271326 Tel: 07483 077188



Deputy DSL

Huma Jabeen

Tel: 01733 271326



Local Authority Designated Officer team:

Cambridgeshire Tel: 01223 727967 (Out of Hours: 0345 0455203) Email: LADO@cambridgeshire.gov.uk Peterborough Tel: 01733 864038 (Out of Hours: 01733 864180) Email: LADO@peterborough.gov.uk

Children's Social Care MASH – 01733 864180/01733 864170

Adult's Social Care MASH - 01733 747474 Option 1

Early Help Helpline – 01733 863649

If you are concerned about the practice or conduct of a member of staff, please speak to Michael Hayden, Head of College If your concern is about the Head of College, if you feel you have not been taken seriously, or for additional safeguarding advice, you can contact:

Paul Routledge - Group Executive Education Lead - 01522 868279/07484 024861

Nicola Cooper – Director of Operational and Practice Performance – 01522 868279/07484 504658

Angela Wood – Head of Therapeutic Lived Experiences – 01522 868279

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Document Change Log

The Change Log is a register of all authorised changes made to this document.

Version	Description of change:	Change made by:	Date document republished:
7	Reviewed, renumbered from ED37 to EDCC02, integrated	Paul	September 2024
	Online Safety guidance, moved to new format	Routledge	
8	Appendix 3 updated	Monika	November 2024
		Jaronska	
9	Appendix 3 updated	Monika	June 2025
		Jaronska	