



## Trust Safeguarding & Child Protection Policy (2021/22)

<b>Academy level contribution:</b>	Ambleside Academy Woodlands Academy	Denewood & Unity Academies Westbury Academy
<b>CEO approval:</b>	Sean Kelly	<b>Date:</b> September 2021
<b>Extended Leadership Team consultation (where applicable):</b> <b>Next review due by 1st September 2022</b>	<b>Jane Bromley</b> <b>Andrew Morgan</b> <b>Matt McCluskey</b> <b>Lee Morgan</b>	<b>Date:</b> Autumn 2021
<b>Chair of Trustees consultation (where applicable):</b>	Eileen Hartley	<b>Date: September 2021</b>
<b>Safeguarding Trustee consultation (where applicable):</b>	Tom Shaw	<b>Date:</b> September 2021
<b>Board ratification:</b>	Raleigh Learning Trust Board	<b>Date: Autumn 2021</b>

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## 1. Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Ambleside Primary Academy DSL(s)	Jane Bromley -Academy Principal  Vicky Jackson - Designated teacher for children looked after  Diana Boulton - DSL  Amy Johnson - DSL  Rachel Walters - DSL	0115 900 3610
Denewood & Unity Academy DSL(s)	Mathew McCluskey- Academy Principal  Krissy Higginson - DSL & Designated teacher for children looked after  Luke Sisson -DSL  Sarah Williams – DSL	0115 915 1271
Westbury Academy DSL(s)	Lee Morgan Academy Principal  Jon Motler - Designated teacher for children looked after  Bev Murray -DSL  John Richardson – DSL  Dan Siddons – Deputy DSL  Tom Eddy – Deputy DSL	0115 915 5858
Woodlands Academy DSL(s)	Andrew Morgan Academy Principal  Andy While - DSL & Designated teacher for children looked after  Polly Smith - DSL  Jo Doidge - DSL  Al Rea – Deputy DSL  Paul Wyles - Deputy DSL	0115 915 5734

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Raleigh Learning Trust Safeguarding Lead	Bev Murray	07850716495
Local authority designated officer (LADO)	0115 876 2302	
Board of Trustees Chairperson	Eileen Hartley	0115 855 0100
Safeguarding Trustee	Tom Shaw	0115 855 0100
Channel helpline Nottingham City Social Care	020 7340 7264 0115 876 4800 or email: <a href="mailto:candfdirect@nottinghamcity.gov.uk">candfdirect@nottinghamcity.gov.uk</a>	

## 2. Aims

The Raleigh Learning Trust is committed to safeguarding and promoting the welfare of children and young people and we expect all staff and volunteers to share this commitment. Creating a culture of safety and vigilance for our pupils is of paramount importance, we aim to:

- create and maintain a safe environment
- manage situations should child welfare concerns arise
- create an atmosphere of trust in which pupils feel confident to confide any concern
- help young people to understand the difference between acceptable and non - acceptable behaviour
- teach pupils to stay safe from harm

Raleigh Learning Trust pupils are taught about safeguarding, including E-safety as part of a broad and balanced curriculum. All staff within the Trust take welfare concerns seriously and encourage children and young people to talk about anything that worries them.

## 3. Legislation and statutory guidance

- This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

**This policy is also based on the following legislation:**

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), 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
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what ‘regulated activity’ is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children

#### **Ambleside Primary Academy and Woodlands Academy only:**

- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

#### **This policy also complies with the Nottingham City Safeguarding Children Partnership:**

- <https://www.nottinghamcity.gov.uk/information-for-residents/children-and-families/nottingham-city-safeguarding-children-board/>

## **4. Definitions**

### **Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment
- 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

**Child protection** is part of this definition and refers to activities undertaken to prevent children from suffering, or being likely to suffer, harm or significant harm.

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

**Neglect** is a form of abuse and 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. Appendix 1 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Children** include everyone under the age of 18.

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)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

## 5. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- 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 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 section 15)

## 6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### 6.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education Sept 2021](#) & Working Together to Safeguard Children July 2018 (amended Dec 2020) and review this guidance at least annually.

All staff will be aware of:

- Systems and procedures that support safeguarding, including this policy, each academy's behaviour policy, staff code of conduct, the identity/role of the designated safeguarding lead (DSL) and DSL teams, and the necessary safeguarding response to children who go missing from education (CME).

- The early help process and their individual and team role, 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 the local authority(ies) 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 and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

## **6.2 The designated safeguarding lead (DSL) at each academy**

The DSL is a member of the senior leadership team and takes lead responsibility for child protection and wider safeguarding. Please see ‘Important contacts’ (page 1) for each academy’s Safeguarding Team.

The DSL will be given the time, funding, training, resources and support to:

- Be the first point of contact for staff concerning child welfare and child protection matters (if DSL is not available staff must contact a senior leader)
- Be aware of pupils who have a social worker
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school leadership staff.
- Provide advice and support to other staff on child welfare and child protection matters, including delivering staff annual training and termly updates
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Complete safeguarding induction e.g. agency staff, including obtaining safer recruitment information for the SCR, if appropriate
- Record, monitor and track all referrals
- Carry out regular quality assurance on all records and referrals (Dip Test)
- Ensure that child protection information is transferred to the pupil’s new school
- Ensuring risk assessments put in place for pupils are recorded on our safeguarding electronic system
- To liaise with the link Safeguarding Trustee as necessary.

The DSL will also keep the Principal (if they are not the DSL) informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. DSL may also seek advice/guidance from the Trust Safeguarding Lead.

## **6.3 Board of Trustees/ Local Governor Board**

All Trustees and Governors have an enhanced DBS which is recorded on the single central record (SCR) and 128 management checks are carried out and recorded. The Chair of Trustees has an enhanced DBS which is countersigned by the Secretary of State.

Trustees and Governors have a key responsibility for monitoring safeguarding and child protection across the Trust.

Responsibilities include:

- To ensure a child protection /safeguarding policy in place.
- To ensure procedures in place for dealing with allegations against a member of staff not just within the Trust setting but also staff's conduct outside our setting which is known as the 'harm' test. This is concerning a person's conduct outside the Trust and need not include a child, for example, domestic abuse of a partner.
- To ensure appropriate staff training is in place.
- To ensure there is a member of the Trustees who is responsible for and has been trained for safeguarding, child protection and safer recruitment.
- To ensure policies and procedures in the Academies are reviewed annually, or earlier where necessary.

#### **6.4 Trust Safeguarding Lead: Bev Murray**

The Trust Safeguarding Lead will offer support and challenge, concerning all safeguarding matters. Through regular quality assurance, they will ensure all processes and procedures operate to a high standard across all the academies within the Trust. They are responsible for:

- To support and advise on a safeguarding training programme in partnership with the academies.
- To work collaboratively with colleagues offering support and guidance
- To ensure the Safeguarding policy is updated in line with guidance and statutory policies.
- To quality assure all records and referrals to external agencies.
- To complete annual safeguarding audits are completed and shared with the appropriate stakeholders, including the Safeguarding Trustee.
- To support the Academy Principals with allegations against staff and attending any relevant meetings
- To chair the Raleigh Learning Trust Safeguarding Network meeting
- To ensure all relevant safeguarding updates and best practices are shared within the Trust via the Safeguarding Network Meetings.
- To be aware of any pupils who are at a critical stage of their CP plan
- To provide advice to stakeholders concerning welfare, safeguarding and child protection issues.
- To meet with the Safeguarding Trustee annually
- To provide regular updates to the Central Executive team
- To oversee the Single Central Record across the academy sites
- To work alongside the Trust Data Protection Officer with regards to Subject Access Requests with a safeguarding nature.

#### **6.5 The Principal**

The Principal 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
- Communicating this policy to parent/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable (Ambleside & Woodlands EYFS)
- Making sure each child in the Early Years Foundation Stage is assigned a key person (Ambleside & Woodlands EYFS).

## 7. Confidentiality

Please see the Trust’s Data Protection Policy

<http://www.raleighlearningtrust.co.uk/wp-content/uploads/sites/2/2020/01/Data-Protection-Policy-Schools.pdf>

The personal information about all pupils’ families is regarded by those who work in this Trust as confidential. All staff and volunteers need to be aware of the confidential nature of personal information and will aim to maintain this confidentiality:

- Staff understand that they need to know only enough to prepare them to act with sensitivity to a pupil and to refer concerns appropriately. The DSLs and Principals will disclose information about a pupil to other members of staff on a need to know basis only. It is inappropriate to provide all staff with detailed information about the pupil, incidents, the family and the consequent actions.
- All Trust staff operate within the information-sharing advice document July 2018 ‘Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many Serious Case Reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.’

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

## 8. Recognising abuse and taking action

Staff, volunteers and governors/trustees must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL or Safeguarding Team.”

### 8.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

Children and Families Direct:

Email: [candfdirect@nottinghamcity.gov.uk](mailto:candfdirect@nottinghamcity.gov.uk)

Tel: 0115 8764800

GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

## 8.2 If a child makes a disclosure to you

If a child 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
- Do not make personal comments e.g. if a pupil asks “what do you think?”
- Tell the child 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
- Write-up and submit via the electronic safeguarding system (by the end of the day), alerting the DSL/Principal (**STAFF MUST NOTIFY THE DSL/PRINCIPAL IN PERSON OF ANY CONCERNS WHERE A CHILD MAY BE AT RISK IF THEY WERE TO GO HOME**). Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 8.1), and tell the DSL as soon as possible that you have done so.

## 8.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education’s Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

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 appendix 4.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally (with the support from the DSL). This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, involve children's social care as appropriate.

**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, **immediately**.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL, **immediately** and follow our local safeguarding procedures.

#### **8.4 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)**

Figure 1 on page 13 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree on a course of action.

If in exceptional circumstances 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.

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**

If early help 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.

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.

Procedures for early help may include:

- Referral to the school counsellor
- Behaviour Therapist
- CAMHS
- CAMHS Sharp Team
- BEMHS
- MARF (DSL will make this referral)
- Whole Life disability team- pupils who have an EHCP

Please see the academies DSL for more information

##### **Referral**

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.

If you make a referral directly (see section 8.1), you must tell the DSL as soon as possible.

The local authority will decide 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.

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.

For information on escalation procedures please refer to the Trust Safeguarding Lead (Bev Murray), who will provide the appropriate support and advice:

Email: [beverley.murray@raleighlearningtrust.co.uk](mailto:beverley.murray@raleighlearningtrust.co.uk)

## 8.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree on a course of action.

If in exceptional circumstances 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 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

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 [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergencies.

In an emergency, 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

## 8.6 If you have a mental health concern

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.

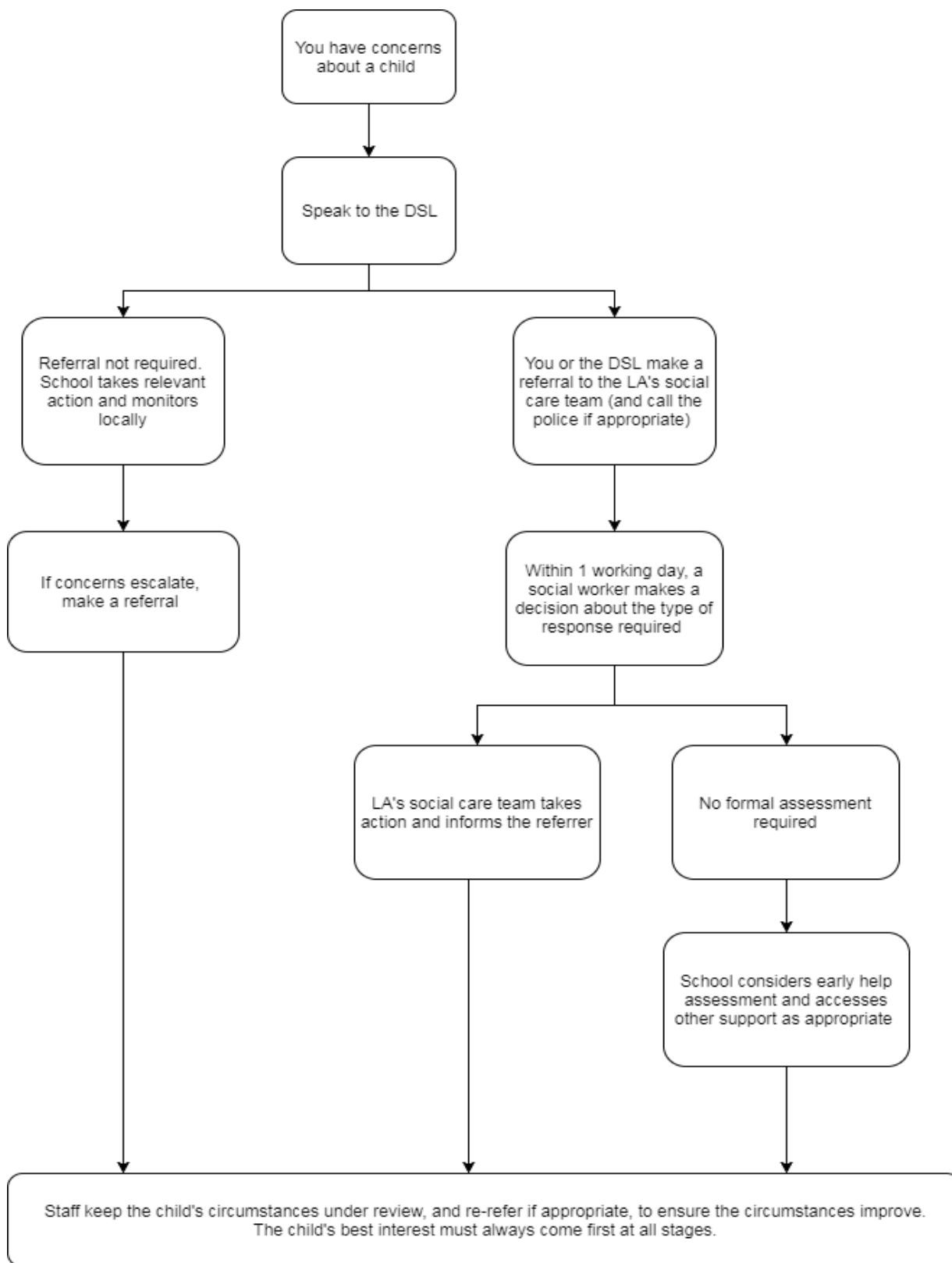
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree on a course of action.

**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)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



## 8.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the Trust's CEO (Sean Kelly), if the concerns/allegations are about the CEO, speak to the chair of the Board of Trustees.

<https://www.raleighlearningtrust.co.uk/contact-us/>

This applies to all cases where it is alleged that a staff member, supply teacher or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

### Non-recent allegations

Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

### Low-level concerns

In line with Section Two of Part Four of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored and reinforced by staff.

#### Definition of low-level concerns:

The term 'low-level' concern does not mean that the concern is insignificant, it means that the threshold set out at the start of 8.7 has not been met. A low-level concern covers any concern no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the academy/trust may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and.
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- examples of such behaviour could include, but are not limited to:
  - being over-friendly with children
  - having favourites
  - taking photographs of children on a personal mobile phone
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - using inappropriate sexualised, intimidating or offensive language.

*Such behaviour can exist on a spectrum.*

### Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Principal. Any concerns about the Principal should be reported to the Chair of Governors/CEO.

## **Recording low-level concerns**

All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which the concern arose, and action is taken. Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a concern to meeting the harms threshold.

## **Low-level concerns and references**

Low-level concerns will not be included in references unless they relate to issues that would normally be included in a reference, for example, misconduct or poor performance. Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

## **Early years providers (Ambleside & Woodlands only):**

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

## **8.8 Allegations of Peer-on-peer abuse**

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”.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. Peer on peer abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element that facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that 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 nudes and semi nudes images and or videos<sup>13</sup> (also known as sexting or youth produced sexual imagery)
- Upskirting,<sup>14</sup> which typically involves taking a picture under a person’s clothing without their permission, to view their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- Use of drugs or alcohol, where a pupil is forced/coerced to participate in

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation (under the 'Peer-on-peer abuse' category) 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 involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

For further information refer to the academy's Behaviour Policy (and Anti-Bullying policy).

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

- Challenging any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Being 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
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils can easily and confidently report abuse using our reporting systems
- Ensuring staff reassure victims that they are being taken seriously
- Ensuring staff are trained to understand:
  - How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
  - That even if there are no reports of peer-on-peer 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's 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 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 child's behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy



- The important role they have to play in preventing peer-on-peer 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

## 8.9 Sexting

### Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘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 (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

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

Following a report of an incident, the DSL/Principal will organise 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) 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 pupils involved which would influence risk assessment
- 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)
- The DSL will make an immediate referral to police and/or children’s social care if:
  - The incident involves an adult
  - 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 special educational needs)
- 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 self-harming)

If none of the above applies then the DSL, in consultation with the principal 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**

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.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

#### **Informing parent/carers**

The DSL will inform parent/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**

If it is necessary to refer an incident to the police, this will be done via calling 101.

#### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded via our electronic safeguarding system.

#### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our PSHE and/or computing programmes. Teaching covers the following in relation to sexting:

- What it is
- 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
- 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

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

### **9. Notifying parent/carer(s)**

Where appropriate, we will discuss any concerns about a child with the child's parent/carers. The DSL will normally do this in the event of suspicion or disclosure.

Other staff will only talk to parent/carers about any such concerns following consultation with the DSL.

If we believe that notifying the parent/carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parent/carers of all the children involved.

## **10. Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

## **11. Children Missing from education**

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parent /carers when pupils are not at school. This means we need to have at least two contact numbers for parent /carers. Parent/carers should remember to update the school as soon as possible if the numbers.

If there is a concern a child may be missing from education (CME), the academy's DSL will follow Nottingham City protocols and procedures for reporting CME.

## **12. Together we can stop child sexual abuse**

No child should be a victim of sexual abuse (please see appendix 1) and the Trust is committed to preventing children from becoming/being victims of sexual abuse. If staff have any concerns, they must report these to the DSL immediately or/and contact the NSPCC on:

Tel: 0800 800 5000

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

For further information please visit the 'Stop abuse together campaign' website

<https://stopabusetogether.campaign.gov.uk/>

## **13. Contextual safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. **All** staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors so schools and colleges must provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

## 14. Pupils with a social worker

Pupils 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.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil'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

## 15. Children looked after and previously Children in care

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children'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 social workers and relevant virtual school heads.

Each academy has an appointed a designated teacher (please see 'Important contacts'), who is responsible for promoting the educational achievement of children looked after (CLA – previously known as LAC) and previously children in care (CIA) in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding Children looked after and previously Children in care are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

## 16. Online Safety /E-learning

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 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 (which we refer to as '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

### **The 4 key categories of risk**

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

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **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 to groom or exploit them for sexual, criminal, financial or other purposes
- **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; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- Educate pupils 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 are a witness rather than a victim
- Ensure staff complete the “Staying safe online” e-learning module annually
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents’ evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- 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](#)
- Put in place robust filtering and monitoring systems to limit children’s exposure to the 4 key categories of risk (described above) from the school’s IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

*For further information please refer to the academy’s Online Safety/E-learning Policy.*

## **17. Mobile phones and cameras**

Staff are allowed to bring their personal phones to school for their own use but will limit such use to the non-contact time when pupils are not present, unless in an emergency.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

For further information, please refer to the Code of Conduct.

## **18. Complaints and concerns about school**

### **18.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled following our procedures for dealing with allegations of abuse made against staff (section 8.7). Also, please refer to the Trust's complaints policy.

### **18.2 Whistle-blowing**

Please see Trust's Whistle-blowing policy.

<https://www.raleighlearningtrust.co.uk/wp-content/uploads/sites/2/2021/03/Whistleblowing-Policy-December-2020.pdf>

NSPCC Whistle-blowing helpline: 0800 0280285

## **19. Record-keeping**

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded via the electronic safeguarding system. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily 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.

Safeguarding records relating to individual children will be retained in line with KCSIE 2021 and the Raleigh Learning Trust's retention schedule.

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 promptly and securely, and separately from the main pupil file. Also, 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.

## **20. Training**

### **20.1 All staff**

All staff members will undertake safeguarding and child protection procedures training at induction, including whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. New staff will receive safeguarding training within the first half term should any existing training received be old or out of date.

This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will be complete the Trust's mandatory safeguarding e-learning modules scheduled throughout the academic year. Safeguarding training will be tracked via the academy's MIS.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. This training will be refreshed annually via the Home Office online course.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

*Update: All staff to receive updated training on "Together we can stop child sexual abuse" via the Academy's DSL during the Summer Term 1 2021.*

## **20.2 The DSL**

The DSL will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through Nottingham city DSL termly networks, e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training annually.

The DSLs will be supported by the Trust Safeguarding Lead and the Safeguarding Network.

## **20.3 Board of Trustees/ Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

## **20.4 Recruitment – interview panels**

Please refer to the Trust's Safer Recruitment policy.

<https://www.raleighlearningtrust.co.uk/wp-content/uploads/sites/2/2021/02/Recruitment-and-Selection-Policy-01.12.20.pdf>

## **20.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

All staff have access to and must-read - KCSIE part 1, Policies, code of conduct, Safeguarding and Child Protection, whistleblowing, behaviour, attendance- policies, children missing from education.

## **21. Restrictive Positive Intervention**

Restraint may be necessary to safeguard the individual and/or others from serious injury or harm, and sometimes it will be the only realistic option, for example, to prevent a child from running into a busy road.

We aim to promote a positive and proactive approach to behaviour, including de-escalation techniques appropriate to the child or young person, to minimise the likelihood of or avoid the need to use restraint.

The use of restraint is based on an assessment of risk and to safeguard the individual or others.

Restraint should only be used where it is necessary to prevent the risk of serious harm, including injury to the child or young person.

*For further details please read the Individual Academies Behaviour/RPI policies.*

## **22. Screening and searching process**

Staff may lawfully search electronic devices, without consent or parental permission, if there is a suspicion that the pupil has a device prohibited by school rules, or the staff member has good reason to suspect the device may be used to:

- Cause harm
- Disrupt teaching
- Break school rules
- Commit an offence
- Cause personal injury, or damage property.

*It must be noted, this is not an exhaustive list.*

Any data, files or images that are not believed to be unlawful, may be deleted or kept as evidence of a breach of the Individual Academy behaviour policy.

Each Academies Senior Leadership Team must be alerted to any concerns regarding electronic devices. 2 members of the leadership team will search the electronic device and take the appropriate action. Staff reporting a concern of this nature must inform the behaviour lead immediately and an incident form completed. If there is a concern regarding the material on the electronic device it must be reported to the DSL by the end of the working day. The DSL will take the appropriate action according to the material discovered by SLT.

## **23. Monitoring arrangements**

This policy will be reviewed **annually** by Tom Shaw. At every review, it will be approved by the full governing board.

## **24. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour/Anti-bullying/Restrictive Positive Intervention
- Staff Code of Conduct (also known as staff behaviour policy)
- Whistle-blowing
- Complaints
- Health and safety
- Attendance
- Online safety/E-learning
- Equality
- Sex and relationship education
- First aid
- Curriculum
- Privacy notices
- Safer Recruitment
- GDPR, Data protection
- Disciplinary
- SEND



**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education & working together to safeguard children**

### **Appendix 1: types of abuse**

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

**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.

**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 are being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

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

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

**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
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Upskirting**

“The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.” (Keeping Children Safe in Education Sept 2020)

## **Fabricated induced illness**

Fabricated or induced illness (FII) is a form of child abuse. It occurs when a parent or carer, usually the child’s biological mother exaggerates or deliberately causes symptoms of illness in the child. FII is also known as Munchausen’s syndrome by proxy. FII is a child protection issue and cannot be treated by the NHS alone. Therefore if staff suspect FII they must follow their Academies safeguarding procedures by reporting concerns through the safeguarding electronic system and informing the DSL immediately, the DSL will refer the concerns to the Children and Families direct ( Social Care ). If you suspect that someone you know may be fabricating or inducing illness in their child it is not recommended that you confront them directly. A direct confrontation is unlikely to make a person admit to wrongdoing and it may allow them to dispose of any evidence of abuse.

## **Appendix 2: Specific Safeguarding Issues**

Some children and young people may be particularly vulnerable to abuse and harm. The designated safeguarding lead should be aware of the range of guidance that is available and vigilant to concerns being raised by staff and children which need to be reported in accordance with national (Government) and local (Safeguarding Partnership) procedures without delay. The lead should also ensure staff working with children are alert to signs which may indicate possible abuse or harm. It must be noted some of the text are directly taken from Keeping Children Safe in Education 2021

## **Child Sexual Exploitation**

### **The statutory definition of Child Sexual Exploitation**

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

Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person’s limited availability of choice resulting from their social/economic and/or emotional vulnerability.’ (Department for Education, 2012)

Child sexual exploitation is a form of abuse that involves children (male and female, of different ethnic origins and different ages) receiving something in exchange for sexual activity. Schools are well placed to prevent, identify and respond to children at risk of sexual exploitation.

### ***Who is at risk?***

Child sexual exploitation can happen to any young person from any background. Although the research suggests that females are more vulnerable to CSE, boys and young men are also victims of this type of abuse.

The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face to face and it can happen online. It can also occur between young people.

In all its forms, CSE is child abuse and should be treated as a child safeguarding issue.

[https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners 21](https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners-21)

### **Child Criminal Exploitation (CCE)**

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

### **County Lines**

Criminal exploitation of children (CEC) is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

When children are not attending school, the risk that they could be exploited either criminally and/or sexually is heightened. In line with the Local Authority procedures, a CME (child missing in education) referral will be made in line with timescales set out in the Attendance and Punctuality Policy. When the child returns to school, teachers and staff must be aware of the signs and symptoms of trauma and refer any concerns swiftly. DSLs are able to seek support in the case of exploitation by completing a Children at Risk of Exploitation Toolkit and contacting the Exploitation Coordinator [rachael.osborne@nottinghamcity.gov.uk](mailto:rachael.osborne@nottinghamcity.gov.uk)

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance

([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/99317/2/Modern Slavery Statutory Guidance EW Non-Statutory Guidance SNI v2.3.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/99317/2/Modern_Slavery_Statutory_Guidance_EW_Non-Statutory_Guidance_SNI_v2.3.pdf))

### **Honour Based Abuse including Forced Marriage**

Honour Based Abuse is a cultural, not a religious phenomenon. It impacts a range of communities. The challenges for services include developing responses that keep people safe and hold perpetrators to account without stereotyping, stigmatising or making assumptions about any given individual or community. Honour Based Abuse, which may include forced marriage and/or female genital mutilation, is perpetrated against children and young people for several reasons. These include:

- Protecting family 'honour' or 'izzat'
- To control unwanted behaviour and sexuality (including perceived promiscuity or being lesbian, gay, bisexual or transgender)
- As a response to family, community or peer group pressure
- Strengthening family links
- Protecting perceived cultural and/or religious ideals (misguided or dated)
- Retaining wealth, property or land within the family
- Preventing unsuitable relationships
- Assisting claims for residence and citizenship in the UK
- Perceived immoral behaviour including:
  - Inappropriate make-up or dress
  - Possession and/or use of a mobile telephone
  - Kissing or showing other forms of intimacy in public
  - Rejecting a forced marriage
  - Being a victim of rape or other serious sexual assault
  - Inter-faith relationships
  - Seeking a divorce.

## **Forced Marriage**

'A forced marriage is a marriage in which one or both spouses do not (or, in the case of children and some adults at risk, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' Scottish Government

"A marriage conducted without the valid consent of both parties where duress is a factor." A Choice by Right (June 2000)

Forced Marriage (Civil Protection) Act 2007 (England/Wales)

- Courts have the power to make Forced Marriage Protection Orders.
- Breach of an injunction would not itself be a criminal offence but would be a contempt of court. Courts would have the full range of sanctions available to them, including imprisonment.
- Enables third parties to apply for an injunction on behalf of somebody

There will be a maximum penalty of seven years for committing a forced marriage offence and a maximum penalty of five years for breach of a forced marriage protection order.

Staff must report concerns regarding forced marriage to the DSL immediately to ensure safeguarding procedures can be implemented, the DSL will inform the Academy Principal, Children and Families social care and the police.

## **Private Fostering**

A private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before a private fostering arrangement is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not doing so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools must inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself must inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

### **Preventing Radicalisation**

Preventing violent extremism by countering the ideology of extremism and by identifying those who are being drawn into radicalism has for some time formed part of our approach to safeguarding. The Counter-terrorism and Security Act 2015 now imposes a duty on a wide range of bodies including all academies. Compliance will be monitored through various inspection regimes such as Ofsted that will be looking to see that organisations have assessed the level of risk and that staff are appropriately trained to look out for signs of radicalisation and are aware of the process for making referrals to Channel, the panel that reviews and refers individuals to programmes to challenge extremist ideology. The guidance on this has not yet been published but we will be sharing this as soon as possible as well as keeping you informed on how we are coordinating this in a partnership approach.

In the meantime, if you have any concerns about individuals who may be being drawn into support for extremist ideology, please contact the Prevent Team [prevent@nottinghamshire.pnn.police.uk](mailto:prevent@nottinghamshire.pnn.police.uk). Although a police team, their role is to support early intervention so that vulnerable children or adults do not end up facing criminal sanctions.

To minimise the risk, staff will look out for early signs of radicalisation/extremism, such as pupils;

- showing sympathy for extremist causes
- glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality

### **Incels Community**

Definition of incels:

A member of a sprawling online community. Incels are men who describe themselves as “involuntary celibates”. “They see women as completely commodified and dehumanised sex objects [that] are there purely for male sexual pleasure. And they blame women for the fact that they’re not having sex.”

(Guardian, 2021)

Possible indicators of Incels involvement could include:

- include derogatory comments/writings/drawings about women
- social isolation/exclusion and general signs of radicalisation

If staff have any concerns about a student being involved with the incel community or sharing incel ideology, they must report this immediately to the DSL/safeguarding team.

## **Peer-on-peer abuse**

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer 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 peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element that facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element that 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 nudes and semi nudes 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/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)

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.

If staff have any concerns about peer-on-peer abuse, or a child makes a disclosure to them, report immediately to the DSL.

## **Sexual violence and sexual harassment between children in schools**

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)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, staff must 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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.

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), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting upskirts. 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 DSL immediately.

### **Serious violence**

Indicators that 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 (this 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 above))

Risk factors that increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

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 at risk of, serious violence, they will report this to the DSL.

### **Children who self-harm**

Staff **must** always be mindful of the underlying factors which may lead a child or young person of any age to self-harm. This is particularly the case for children of primary school age as self-harm in this age group is uncommon. Where information comes to the attention of practitioners which suggests that a primary age child has self-harmed serious consideration must be given to whether there are other underlying factors, including abuse.



## **Domestic abuse**

### **Operation Encompass**

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the designated safeguarding lead in school before the child or children arrive at school the following day.

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.

Older children may also experience domestic abuse and/or violence in their relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

The DSL will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and following local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **Appendix 3: Information and support**

There is a wealth of information available to support schools, colleges and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

- Childnet provide guidance for schools on cyberbullying
- Educateagainssthat provides practical advice and support on protecting children from extremism and radicalisation
- London Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
- NSPCC provides advice on all aspects of a school or college's online safety arrangements
- Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
- Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones
- South West Grid for Learning provides advice on all aspects of a school or college's online safety arrangements
- Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on sexting-in-schools-and-colleges and using-external-visitors-to-support-online-safety-education
- Remote education, virtual lessons and live streaming • Case studies on remote education practice are available for schools to learn from each other

- Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely
- London Grid for Learning guidance, including platform-specific advice
- National cybersecurity centre guidance on choosing, configuring and deploying video conferencing
- National cybersecurity centre guidance on how to set up and use video conferencing 23
- UK Safer Internet Centre guidance on safe remote learning

### **Support for children**

- Childline for free and confidential advice
- UK Safer Internet Centre to report and remove harmful online content
- CEOP for advice on making a report about online abuse

### **Parental support**

- Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- Commonsense media provide independent reviews, age ratings, & other information about all types of media for children and their parent/carers
- Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- Government advice about security and privacy settings, blocking unsuitable content, and parental controls
- Internet Matters provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- Let's Talk About It provides advice for parents and carers to keep children safe from online radicalisation
- London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- Lucy Faithfull Foundation StopItNow resource can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online
- Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- Parentzone provides help for parents and carers on how to keep their children safe online
- Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online