

Policy and Procedure

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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.

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

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. _____ defines neglect in more detail.

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.

Children includes 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)
- 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

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.

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

- Organise appropriate Prevent training for staff.

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.

The executive board will:

- Facilitate a whole-college approach to safeguarding, ensuring that safeguarding and child

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- 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 _____ for contact details).

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.

- 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 _____).
- 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.

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 (SENCOs) social workers, mental health leads and others.

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.

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.

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.

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.

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 _____, and allegations of abuse against staff in _____.

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

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

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 _____, 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.

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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.

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 _____). 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 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.

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.

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

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.

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/vulnerable young adult that is also a safeguarding concern, take immediate action by following the steps in _____.



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,

. If the concerns/allegations are about the Headteacher, speak to the Group Executive Education Lead or a Director.

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).

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.

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.

Abuse can be reported, no matter how long ago it happened.

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.

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.

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 [_____](#). Concerns may arise through, for example:

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

- 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.
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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 \(cambs.police.uk\)](#)

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 _____ of this policy also apply to recording these incidents.

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 used

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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 disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
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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/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.

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.

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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.

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.

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

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

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.

We will hold records in line with our Record Keeping and Archiving Policy.

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.

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.

Concerns and referrals will be kept in a separate child protection file for each child.

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.

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).

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

In addition, they will update their knowledge a (a)-46 (f)-32.5 (e)-4 (y)17.5 (2)9 (y)17.5 (ea)-19 (

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.

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

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.

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes using online platforms.

- 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.

- 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.

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.

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.

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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.

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.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-

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

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
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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.

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.

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.

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.

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.

- Consider if there are wider cultural issues within the college that enabled inappropriate behaviour to occur and whether revising policies and/or provisions (C)-85 (e)1-2.5 (p)2 ((s)-9 (xs)-)-2.5 (i)-46 (

- 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 being at risk of, serious violence, they will report this to x x

- 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.

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.

The DSL and headteacher should oversee and co-ordinate the processes above.



