



DANES EDUCATIONAL TRUST

# CHILD PROTECTION & SAFEGUARDING POLICY- ASCOT ROAD PRIMARY SCHOOL

RESPONSIBILITIES	
To determine and approve policy and ensure compliance	Danes Educational Trust Board
To implement, deliver and comply	Headteacher and School Board
APPROVAL DATE	11 July 2022
COMMITTEE	Trust Board
DURATION	1 Year
REVIEW DATE	01/07/2023
SLT LEAD	Headteacher & Designated Safeguarding Lead

## **CONTENTS**

<b>STATEMENT OF INTENT</b>	<b>3</b>
<b>HERTFORDSHIRE SAFEGUARDING CHILDREN PARTNERSHIP PROCEDURES</b>	<b>3</b>
<b>IMPORTANT CONTACTS</b>	<b>4</b>
<b>ACRONYMS</b>	<b>5</b>
<b>DEFINITIONS</b>	<b>8</b>
<b>LEGAL FRAMEWORK</b>	<b>10</b>
<b>ROLES AND RESPONSIBILITIES</b>	<b>11</b>
<b>MULTI-AGENCY WORKING</b>	<b>16</b>
<b>EARLY HELP (KNOWN AS FAMILIES FIRST IN HERTS)</b>	<b>16</b>
<b>ABUSE AND NEGLECT</b>	<b>17</b>
<b>SPECIFIC SAFEGUARDING ISSUES</b>	<b>18</b>
<b>CHILD-ON-CHILD ABUSE (FORMALLY PEER-ON-PEER) including Sexual Harassment &amp; Assault</b>	<b>19</b>
<b>ONLINE SAFETY AND PERSONAL ELECTRONIC DEVICES</b>	<b>20</b>
<b>CONSENSUAL AND NON-CONSENSUAL SHARING OF INDECENT IMAGES AND VIDEOS</b>	<b>21</b>
<b>CONTEXT OF SAFEGUARDING INCIDENTS</b>	<b>21</b>
<b>CHILDREN POTENTIALLY AT GREATER RISK OF HARM</b>	<b>21</b>
<b>USE OF THE SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES</b>	<b>23</b>
<b>ALTERNATIVE PROVISION</b>	<b>24</b>
<b>WORK EXPERIENCE</b>	<b>24</b>
<b>HOMESTAY EXCHANGE VISITS</b>	<b>24</b>
<b>CONCERNS ABOUT CHILDREN</b>	<b>25</b>
<b>MANAGING REFERRALS</b>	<b>26</b>
<b>CONCERNS ABOUT SCHOOL SAFEGUARDING PRACTICES</b>	<b>27</b>
<b>SAFEGUARDING CONCERNS AND ALLEGATIONS AGAINST STAFF OF ABUSE</b>	<b>27</b>
<b>COMMUNICATION AND CONFIDENTIALITY</b>	<b>28</b>
<b>SAFER RECRUITMENT</b>	<b>29</b>
<b>SINGLE CENTRAL RECORD (SCR)</b>	<b>30</b>



<b>TRAINING</b>	<b>30</b>
<b>MONITORING AND REVIEW</b>	<b>31</b>
<b>APPENDICES</b>	<b>1</b>
<b>APPENDIX I: SPECIFIC SAFEGUARDING ISSUES (including Children Missing in Education)</b>	<b>1</b>
Domestic abuse	1
Homelessness	2
Children Missing Education & Attendance	2
Admissions register	4
Child abduction and community safety incidents	5
Child criminal exploitation (CCE)	5
County lines	6
Consensual and Non-Consensual sharing of indecent images	7
Curriculum	7
Cyber-crime	7
Child sexual exploitation (CSE)	7
Modern slavery	8
FGM	8
Forced marriage	10
Radicalisation	11
The Prevent duty	12
Children with family members in prison	12
Children required to give evidence in court	12
Mental health	12
Serious violence	13
<b>APPENDIX II: HOW CHILDREN CAN REPORT CONCERNS OR ALLEGATIONS</b>	<b>14</b>
<b>APPENDIX III: RESPONDING TO REPORTS OF SEXUAL VIOLENCE &amp; SEXUAL HARASSMENT</b>	<b>15</b>
<b>APPENDIX IV: RESPONDING TO INCIDENTS OF YOUTH PRODUCED SEXUAL IMAGES</b>	<b>17</b>
Coordinating a response to incidents of YPSI	17
Resolving YPSI incidents	19
<b>APPENDIX V: CHILDREN MISSING IN EDUCATION (CME) REFERRAL FORM</b>	<b>22</b>



## STATEMENT OF INTENT

**Please note that throughout this policy pupils/students/learners attending schools within the trust are referred to as children and school boards are referred to as governing bodies.**

Danes Educational Trust is committed to safeguarding and promoting the physical, mental and emotional welfare of every child, both inside and outside of each Trust setting irrespective of race, age, ability, gender, language, religion, sexual orientation and culture. We implement this Trust wide preventative approach to managing safeguarding concerns, ensuring that the wellbeing of children is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise at Ascot Road Primary School, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the Trust Board, Trust Central Services and the governing body, the headteacher and staff of each setting understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to their Designated Safeguarding Lead (DSL).
- Teaching children how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any child that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that any Trust employees or volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

## HERTFORDSHIRE SAFEGUARDING CHILDREN PARTNERSHIP PROCEDURES

The Trust follows the procedures established by the Hertfordshire Safeguarding Children Partnership (HSCP); a guide to procedure and practice for all agencies in Hertfordshire working with children and their families. <http://hertsscb.proceduresonline.com/index.htm>

## IMPORTANT CONTACTS

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	<b>Cathy Elsley</b>	<b>principal@ascotroadcfs.org.uk</b>
Deputy DSL (DDSL)	<b>Natalie Beere</b>	<b>nbeere@ascotroadcfs.org.uk</b>
Other staff who have the same level of safeguard training as the DSL and DDSL and are able to deal with safeguarding issues in the absence of the DSL and DDSL are	<b>John Robb</b> <b>Sabeen Kazmi</b> <b>Vanessa Verna</b>	<b>KS2 leader</b> <b>KS1 leader</b> <b>EYFS leader</b>
Local authority designated officer (LADO)	Louise McCourt - CPSLO	
School Board Chair of governors	<b>Abby Odunsi</b>	<b>chair@ascotroadcfs.org.uk</b>
Trust Inclusion and Safeguarding Lead	Mr Chris Marks	01923 284169 ext 2339
Channel helpline	020 7340 7264	
PREVENT Officer Herts	Sophia Lawrence	<a href="mailto:sophie.lawrence@hertfordshire.gov.uk">sophie.lawrence@hertfordshire.gov.uk</a> 07773 094897
Hertfordshire Children Services	0300 123 4043	



## ACRONYMS

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage, increased status or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and barring service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DPO	Data protection officer	The appointed person in school with responsibility for overseeing data protection strategy and implementation to ensure compliance with the UK GDPR and Data Protection Act.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EEA	European Economic Area	The Member States of the European Union (EU) and three countries of the European Free Trade Association (EFTA) (Iceland, Liechtenstein and Norway; excluding Switzerland).
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for children who have significant needs that impact on their learning and access to education. The plan identifies any

additional support needs or interventions and the intended impact they will have for the child.

ESFA	Education and Skills Funding Agency	An agency sponsored by the Department for Education with accountability for funding education and skills training for children, young people and adults.
FGM	Female genital mutilation	All procedures involving the 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.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.
HBA	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales. HMCTS is an executive agency, sponsored by the Ministry of Justice.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse is analysing case files from the Disclosure and Barring Service to learn more about the behaviours of perpetrators who have sexually abused children in institutions, and to understand institutional responses to these behaviours.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC (or CLA)	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.





MAT	Multi-academy trust	A trust established to undertake strategic collaboration and provide education across a number of schools
NPCC	The National Police Chiefs' Council	The National Police Chiefs' Council is a national coordination body for law enforcement in the United Kingdom and the representative body for British police chief officers.
PLAC	Previously looked-after children	Children who were previously in local authority care or were looked after by children's services for more than a period of 24 hours. PLAC are also known as care leavers.
PSHE	Personal, social and health education	A non-statutory subject in which children learn about themselves, other people, rights, responsibilities and relationships.
RSHE	Relationships, sex and health education	A compulsory subject from Year 7 for all children. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to children with special educational needs.
SLT	Senior leadership team	Staff members who have been delegated leadership responsibilities in a school.
TRA	Teaching Regulation Agency	An executive agency of the DfE with responsibility for the regulation of the teaching profession.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.



## DEFINITIONS

The terms “**children**” and “**child**” refer to anyone under the age of 18.

For the purposes of this policy, “**safeguarding and protecting the welfare of children**” is defined as:

- Protecting children from maltreatment.
- Preventing the impairment of children’ 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.

For the purposes of this policy, “**consent**” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, “**sexual violence**” refers to the following offences as defined under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by penetration:** A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual assault:** A person (A) commits an offence of sexual assault if they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, “**sexual harassment**” refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a child’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual “jokes” and taunting.



- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion, and threats.

For the purposes of this policy, **“upskirting”** refers to the act, as identified the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including children and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the **“consensual and non-consensual sharing of nude and semi-nude images and/or videos”**, colloquially known as **“sexting”**, is defined as the sharing between children of sexually explicit content, including indecent imagery. For the purposes of this policy, **“indecent imagery”** is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually
- Sexual activity that involves animals

## **1. LEGAL FRAMEWORK**

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

### **Legislation**

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

### **Statutory guidance**

- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2022) 'Keeping children safe in education 2022'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2022) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

### **Non-statutory guidance**

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Recruit teachers from overseas'

This policy operates in conjunction with the following Trust (T) and school (S) policies:

- Anti-bullying Policy (S)
- Suspension, Exclusions and Appeals Policy (T)
- Online Safety Policy (S)
- Data Security Policy (T)
- Data Protection including Biometrics Policy (T)
- Data Retention Guidelines (T)
- LAC Policy (S) where published
- Whistleblowing Policy (T)
- Allegations Against Staff of Abuse Policy (T)
- Safer Recruitment Policy (T)
- Staff Code of Conduct (including ICT and Electronic Devices) (T)
- Staff Disciplinary Policy (also includes what to do with low-level safeguarding concerns) (T)
- Behaviour (S)

## 2. ROLES AND RESPONSIBILITIES

### All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the child.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which children can learn.
- Be prepared to identify children who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training, during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a child may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put children at risk of harm.



- Be aware of behaviours that could potentially be a sign that a child may be at risk of harm.

**Teachers, including the headteacher, have a responsibility to:**

- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.

**The Trust board has a duty to:**

- Take strategic leadership responsibility for the Trust's safeguarding arrangements.
- Ensure that each school complies with its duties under the above child protection and safeguarding legislation.
- Facilitate a Trust-wide approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Ensure that there are effective and appropriate policies and procedures in place.
- Ensure that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of children and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Ensure that schools contribute to multi-agency working in line with the statutory guidance '[Working Together to Safeguard Children](#)'.
- Ensure that staff working directly with children read at least Part one of KCSIE as outlined in the Trust Code of Conduct.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.

**The School board has a duty to:**

- Ensure there is a link governor to take leadership responsibility for safeguarding arrangements.
- Ensure that the policies, procedures and training opportunities in the school align to the Trust Child Protection and Safeguarding Policy, are effective and comply with the law at all times.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the Trust and LA as part of the inter-agency safeguarding procedures.

- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place for children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Monitor that children are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Monitor that the school has clear systems and processes in place for identifying possible mental health problems in children, including clear routes to escalate concerns and clear referral and accountability systems.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly (at least annually).
- Ensure that there are systems in place for children to express their views and give feedback.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements.

**The headteacher has a duty to:**

- Ensure that the policies and procedures adopted by the Trust board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the VSH to discuss how the pupil premium funding can best be used to support LAC.

- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the child's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for children who go missing from school, particularly on repeat occasions, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that staff are appropriately trained to support children to be themselves at school, e.g. if they are LGBTQ+.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.

**The DSL has a duty to:**

- Take lead responsibility for safeguarding and child protection within their school, including online safety.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
  - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, pastoral support team, where safeguarding concerns are linked to mental health.





- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:
  - Ensuring that the school knows which children have or had a social worker.
  - Maintaining a culture of high aspirations for these children.
  - Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these children are experiencing with teachers and the SLT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
- Ensure that a child's child protection file is transferred within 5 days for an in-year transfer or within the first 5 days of the start of a new term, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the Trust's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties children may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure online/written records of concerns and referrals, and understand the purpose of this record-keeping.

**The designated teacher for LAC/PLAC has a responsibility for:**

- Promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

### **3. MULTI-AGENCY WORKING**

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.

The school will work with CSCS, the police, health services and other services to protect the welfare of its children, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

#### **Information sharing**

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet children's needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the child being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of children. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

### **4. EARLY HELP (KNOWN AS FAMILIES FIRST IN HERTS)**

Early help means providing support as soon as a problem emerges, at any point in a child's life. Any child may benefit from early help, but in particular, staff will be alert to the potential need for early help for children who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.

- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/or neglect in other ways.

The DSL will take the lead where early help is appropriate. This includes liaising with other agencies and setting up an inter-agency assessment as appropriate. The local early help process will be followed as required.

'Families First' is Hertfordshire's programme of early help services for families. A directory of early help services is available at [www.hertfordshire.gov.uk/familiesfirst](http://www.hertfordshire.gov.uk/familiesfirst) and will help practitioners and families find information and support to prevent escalation of needs and crisis.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the child's situation is not improving or is worsening.

## 5. ABUSE AND NEGLECT

For the purposes of this policy, "**abuse**" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the ill treatment of others – this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, "**physical abuse**" is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, "**emotional abuse**" is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional

development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyberbullying, causing the child to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

For the purposes of this policy, **“sexual abuse”** is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, **“neglect”** is defined as the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of a child’s health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that children can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a child being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

## 6. SPECIFIC SAFEGUARDING ISSUES

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

[Appendix I](#) of this policy sets out details about specific safeguarding issues that children may experience and outlines specific actions that would be taken in relation to individual issues.

## **7. CHILD-ON-CHILD ABUSE (FORMALLY PEER-ON-PEER) including Sexual Harassment & Assault**

For the purposes of this policy, “**child-on-child abuse**” is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse, as confirmed in the Child Protection and Safeguarding Policy’s [statement of intent](#).

All staff will be aware that child-on-child abuse can occur between children of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the school DSL if they have any concerns about child-on-child abuse.

All staff will understand the importance of challenging inappropriate behaviour between peers, and will not tolerate abuse as “banter” or “part of growing up”.

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers – sometimes known as ‘teenage relationship abuse’.
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- [Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence.](#)
- [Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.](#)
- Causing someone to engage in sexual activity without consent.
- [The consensual and non-consensual sharing of nude and semi-nude images and/or videos.](#)
- [Upskirting.](#)
- Initiation- and hazing-type violence and rituals, which can 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.

All staff will be clear as to the procedures regarding child-on-child abuse and the role they have to play in preventing it and responding where they believe a child may be at risk from it.

Children will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Children will also be reassured that they will be taken seriously, be supported, and kept safe.

The school’s procedures for managing concerns or allegations are outlined in [Appendix II of this policy](#). Staff will follow these procedures, as well as the procedures outlined in the school’s Anti-bullying Policy and Trust Suspension, Exclusion & Appeals Policy, where relevant.

Where there is a suspected case of sexual assault or sexual harassment each school will follow the

checklist in [Appendix III](#) to ensure a consistent approach is taken with regards appropriate and timely support of the victim(s), alleged perpetrator(s) and others and that staff training and wider curriculum delivery around sexual violence is reviewed after each event.

## **8. ONLINE SAFETY AND PERSONAL ELECTRONIC DEVICES**

The school will adhere to the Online Safety Policy at all times.

As part of a broad and balanced curriculum, all children will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Child attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a child's online activity.

The Trust will ensure that schools use Local Authority filtering systems on ICT equipment to prevent children accessing inappropriate material, in accordance with the Trust's Data Security Policy. The Trust will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what children can be taught online.

Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

### **Communicating with parents**

As part of the usual communication with parents, the school will reinforce the importance of children being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The school will also make it clear to parents what their children are being asked to do online for school.

### **Personal electronic devices**

The use of personal electronic devices, including mobile phones and cameras, by staff and children is closely monitored by the school, in accordance with the Staff Code of Conduct (Trust) and Online Safety policy (school).

Photographs and videos of children will be carefully planned before any activity with particular regard to consent. The DPO will oversee the planning of any events where photographs and videos will be taken.

Where photographs and videos will involve children who are LAC, adopted children, or children for whom there are security concerns, the headteacher will liaise with the DSL to determine the steps involved. The DSL will, in known cases of children who are LAC or who have been adopted, liaise with the children's social workers, carers or adoptive parents to assess the needs and risks associated with the children.

Staff will report any concerns about children' or other staff members' use of personal electronic devices to the DSL.

### **Upskirting**

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting will not be tolerated by the school. Any incidents of upskirting will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

## **9. CONSENSUAL AND NON-CONSENSUAL SHARING OF INDECENT IMAGES AND VIDEOS**

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

The DSL and deputies will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the child, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to children depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that children are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL immediately. [Further guidance can be found in Appendix I](#) and the approach to dealing with an incident can be found in [Appendix III Responding to Incidents of YPSI](#)

## **10. CONTEXT OF SAFEGUARDING INCIDENTS**

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of children' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

## **11. CHILDREN POTENTIALLY AT GREATER RISK OF HARM**

The school recognises that some groups of children can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of children. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

## **Children who need social workers**

Children may need social workers due to safeguarding or welfare needs. These needs can leave children vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a child has a social worker in order to make decisions in the best interests of the child's safety, welfare, and educational outcomes.

Where a child needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision of pastoral or academic support.

## **Home-educated children**

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Child Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a child is taken off roll.

Where a parent has expressed their intention to remove a child from school for EHE, the school, will consult with the LA and other key professionals, to see whether a meeting with the parent is beneficial, before the final decision has been made, particularly if the child has SEND, is vulnerable, and/or has a social worker.

## **Looked After Children and Previously Looked After Children (also known as CLA in Herts)**

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The headteacher will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the child.

The DSL will be provided with the necessary details of children's social workers and the VSH, and, for PLAC, personal advisers.

## **Children with SEND**

When managing safeguarding in relation to children with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the child's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- Children with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs



- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for children with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a child with SEND, the DSL will liaise with the school's SENCO, as well as the child's parents where appropriate, to ensure that the child's needs are met effectively.

### **LGBTQ+ children**

The fact that a child may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ children can be targeted by other individuals. Staff will also be aware that, in some cases, a child who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Response to sexual violence and sexual harassment between children of the same sex and of the LGBTQ+ community will be equally as robust as it is for incidents between children of the opposite sex.

Staff will also be aware that the risks to these children can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these children and provide a safe space for them to speak out and share any concerns they have.

### **Children requiring mental health support**

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

## **12. USE OF THE SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES**

Where the school board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep children safe.

Where the school board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the school board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The school board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The school board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

### **Extracurricular activities and clubs**

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard children and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of children. Paid and volunteer staff understand how they

should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

### **13. ALTERNATIVE PROVISION**

The school will remain responsible for a child's welfare during their time at an alternative provider. When placing a child with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff. In addition, regular opportunities for communication with the child will be included, and documented at any review of provision.

### **14. WORK EXPERIENCE**

When a child is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place. Where the school has children conduct work experience at the school, an enhanced DBS check will be obtained if the child is over the age of 16.

### **15. HOMESTAY EXCHANGE VISITS**

#### **School-arranged homestays in UK**

Where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay. In such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults.

Where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host. In addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household.

#### **School-arranged homestays abroad**

The school will liaise with partner schools to discuss and agree the arrangements in place for the visit. The school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK. The school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange. Children will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable.

#### **Privately arranged homestays**

Where a parent or child arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

### **Private fostering**

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a child being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

## **16. CONCERNS ABOUT CHILDREN**

If a member of staff has any concern about a child's welfare, or a child has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

Staff will be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a child.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the [communication and confidentiality](#) section of this policy.

Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSLs with the matter. If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the child. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the child.

If early help is appropriate, the case will be kept under constant review. If the child's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely using the school child protection management system.

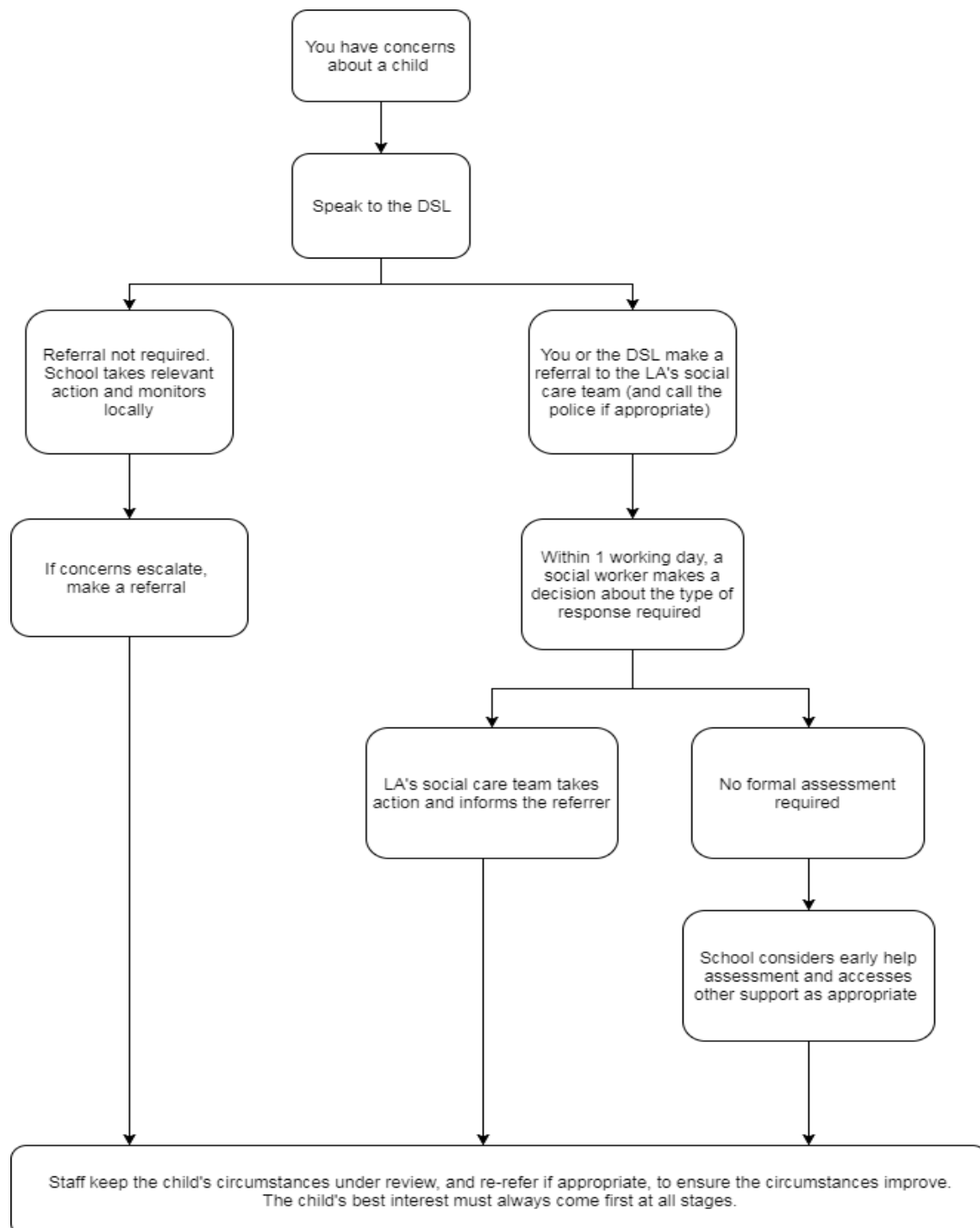
If a child is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a child has committed a crime, such as sexual violence, the police will be notified without delay.

Where there are safeguarding concerns, the school will ensure that the child's wishes are always taken into account, and that there are systems available for children to provide feedback and express their views. When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the child feels like they are being listened to and believed.

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

## 17. MANAGING REFERRALS

The reporting and referral process outlined below will be followed accordingly.



All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the children involved. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a child has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other children: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the child is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the child will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the child or others at potential risk of harm. The school will work closely with parents to ensure that the child, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

## **18. CONCERNS ABOUT SCHOOL SAFEGUARDING PRACTICES**

Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Trust Whistleblowing Policy. If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285).

## **19. SAFEGUARDING CONCERNS AND ALLEGATIONS AGAINST STAFF OF ABUSE**

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the Trust's Allegations Against Staff of Abuse Policy, a copy of which will be provided to, and understood by, all staff. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

When managing allegations against staff, the school will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as "low-level concerns", as defined in the Allegations Against Staff of Abuse Policy. Allegations that meet the harms threshold include instances where staff have:

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

Low-level concerns will be handled in line with the Trust Disciplinary Policy.

## **20. COMMUNICATION AND CONFIDENTIALITY**

All child protection and safeguarding concerns will be treated in the strictest of confidence.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the headteacher and DSL will agree on what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the children involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a child, staff members will not promise the child confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects children from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the children involved. Discussions with parents will not take place where they could potentially put a child at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a child is leaving the school, the DSL will consider whether it is appropriate to share any information with the child's new provider, in addition to the child protection file, that will allow the new provider to support the child and arrange appropriate support for their arrival.

## 21. SAFER RECRUITMENT

The Trust's full policy and procedures for safer recruitment are outlined in the Safer Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The school will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

### **Staff suitability**

All centres providing care for children under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

### **Ongoing suitability**

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

### **Referral to the DBS**

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

## 22. SINGLE CENTRAL RECORD (SCR)

The school keeps a SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

The Trust has access to each school SCR and the information is recorded in such a way that allows for details for each individual school to be provided separately, and without delay, to all who need to see it, including Ofsted. Trust central service staff are placed on the SCR of the school that is their main place of work.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

## 23. TRAINING

Staff members will undergo safeguarding and child protection training at induction, which will be updated on a regular basis and/or whenever there is a change in legislation.

The induction training will cover:

- The Child Protection and Safeguarding Policy.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- Appropriate child protection and safeguarding training, including online safety training.
- Information about the role and identity of the DSL and deputy DSLs.



All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep LAC and PLAC safe.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The DSL and deputy DSLs will undergo child protection and safeguarding training, and update this training at least every two years. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, children with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by children with SEND.

## **24. MONITORING AND REVIEW**

This policy is reviewed at least annually by the Trust Safeguarding Lead and is then sent to the DSL and the headteacher of each school. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

## APPENDICES

### APPENDIX I: SPECIFIC SAFEGUARDING ISSUES (including Children Missing in Education)

This appendix sets out details about specific safeguarding issues that children may experience and outlines specific actions that would be taken in relation to individual issues.

Here are the issues covered:

1. [Domestic abuse](#)
2. [Homelessness](#)
3. [Children Missing Education & Attendance](#)
4. [Child abduction and community safety incidents](#)
5. [Child criminal exploitation \(CCE\)](#)
6. [Consensual and Non-Consensual sharing of indecent images](#)
7. [Curriculum](#)
8. [Cyber-crime](#)
9. [Child sexual exploitation \(CSE\)](#)
10. [Modern slavery](#)
11. [FGM](#)
12. [Forced marriage](#)
13. [Radicalisation](#)
14. [Children with family members in prison](#)
15. [Children required to give evidence in court](#)
16. [Mental health](#)
17. [Serious violence](#)

#### Domestic abuse

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, **“domestic abuse”** is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person’s child) where both are aged 16 or over and are personally connected.

**“Abusive behaviour”** includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse.

**“Personally connected”** includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.



## **Homelessness**

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because “they have to”.

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

## **Children Missing Education & Attendance**

In accordance with each school's Attendance Policy, absences are rigorously pursued and recorded. Each school, in partnership with the appropriate agencies, takes action to pursue and address all unauthorised absences in order to safeguard the welfare of children and young people in its care.

We implement the statutory requirements in terms of monitoring and reporting children missing education (CME) and off-rolling and understand how important this practice is in safeguarding children and young people.

## **Who is a Child Missing from Education?**

A child is missing from education if they are of compulsory school age (age 5-16), do not have a school place and no alternative education arrangements have been made for them. A child is not defined as missing from education if they have a school place but are not attending regularly, if they are being home educated or if they attend alternative provision such as a college or Education Support Centre. Some children, often the most vulnerable, are at greater risk of going missing from education.

These vulnerable groups include:

- looked after children
- children living in women's refuges
- young runaways
- children of homeless families, perhaps living in temporary accommodation
- children with long term medical or emotional problems
- unaccompanied asylum seekers
- children of refugees or asylum seeking families
- children in new immigrant families not yet established in the UK
- children from a Gypsy, Roma or Traveller background
- children who are privately fostered
- young carers
- children from transient families
- teenage mothers
- young offenders



- children permanently excluded from school

**Children missing from education are at greater risk of:**

- physical harm
- sexual exploitation
- becoming involved in crime
- demonstrating anti-social behaviour
- abusing drugs and alcohol
- being illegally employed

The school works closely with the Local Authority and other agencies to help safeguard children who may be missing from education.

**Role of the Children Missing from Education Officer (CMEO)**

The Children Missing Education Officer (CMEO) is part of Children's Services Integrated Services for Learning team and is responsible for receiving all CME referrals. The CME Officer keeps a record of all children reported as missing from education. Children are tracked until they return to suitable education.

Examples of the work undertaken by the CME Officer include:

- making enquiries of parents as to the educational arrangements they are making for their child
- ensuring parents make applications for school places
- making follow up enquiries with schools, teams and agencies within the local authority
- making visits to the last known address
- liaising with other local authorities and schools
- asking for follow up from the police and Border Force as appropriate
- issuing School Attendance orders on behalf of the local authority
- adding information to the School2School secure data system

If the child is missing from education, the CME Officer will ensure the details are passed to the appropriate team to secure suitable education. All children missing from education will be monitored by the CME Officer until such time as suitable provision is made.

**Referral process for children believed to be missing from education**

The referral procedure for children believed to be missing from education is followed by the school if a child they believe to be missing from education comes to their attention.

Anyone who believes a child may be missing from education can contact the CME Officer for advice on **01992 556867** or by completing and returning [the attached referral form](#) to by post (or in the schools post) to the:

Children Missing Education Officer:  
Central Attendance and Employment Support Team  
Hertfordshire County Council  
Room 134 CHO 136  
County Hall  
Pegs Lane  
Hertford SG13 8DF

It is important not to email information containing children's details as this is not secure.



It is likely that schools receiving direct applications for admission to the school outside of the normal admissions cycle will be the first to know of children missing from education. In the event that the school is unable to offer a place, and it appears from the application that the child is not in education, a referral should be made as described above. Following this procedure will enable the local authority to meet its statutory duties relating to the identification of children missing education, safeguarding their welfare and protecting their entitlement to education.

A copy of the referral form can be found in [Appendix V](#). If a child does not reside in Hertfordshire, contact will need to be made with the relevant Local Authority.

### **Admissions register**

Children are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the child will first be attending. The school will notify the LA within 5 days of when a child's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each child where possible. Staff will monitor children who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the child will live
- The new address
- The date from when the child will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the child first attended, or is due to attend, that school

Where a child moves to a new school, the school will use a secure internet system to securely transfer children's data within 5 days of leaving the school for in-year transfers or within 5 days from the start of term.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any child who is going to be deleted from the admission register, in accordance with the Education (Child Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the child continuing to attend school after ceasing to be of compulsory school age.



- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a child from the admissions register where the school and LA has been unable to establish the child's whereabouts after making reasonable enquiries into their attendance.

If a child is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the child
- The full name and address of any parent with whom the child lives
- At least one telephone number of the parent with whom the child lives
- The full name and address of the parent with whom the child is going to live, and the date that the child will start living there, if applicable
- The name of the child's new school and the child's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Child Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for children back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

### **Child abduction and community safety incidents**

For the purposes of this policy, "**child abduction**" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with children.

Children will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

### **Child criminal exploitation (CCE)**

For the purposes of this policy, "**child criminal exploitation**" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that children involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that children of any gender are at risk of CCE.

School staff will be aware of the indicators that a child is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.

### **County lines**

For the purposes of this policy, “**county lines**” refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a child may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owning a ‘debt bond’ to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of children with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a child may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.



## **Consensual and Non-Consensual sharing of indecent images**

The school understands that creating and sharing an indecent image of an individual under the age of 18 is illegal, even if the individual sends one of themselves. Similarly, the school understands that the sharing of an image of a child – even if it has been shared with consent – is a criminal offence. As such, the school will take its approach towards YPSI very seriously and all cases will be fully investigated ([see Appendix III](#)).

The school also understands that the law surrounding creating and sharing indecent imagery of those under 18 was intended to criminalise adults seeking to sexually abuse under 18-year-olds, and not to criminalise under 18-year-olds. Individuals under the age of 18 will not be unnecessarily criminalised.

## **Curriculum**

Children are taught to understand and manage risk through the school PSHE education and relationships and sex education lessons and through all aspects of school life.

The school is committed to ensuring that children are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All children know that we have senior members of staff with responsibility for child protection and they are made aware of whom these persons are. We inform children of whom they might talk to, both in and out of school, their right to be listened to and heard and what steps can be taken to protect them from harm.

Subjects such as Personal, Social and Health Education discuss relevant safeguarding issues with the children.

## **Cyber-crime**

For the purposes of this policy, **“cyber-crime”** is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber-dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as ‘hacking’.
- Denial of Service attacks, known as ‘booting’.
- Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring children to the National Crime Agency’s Cyber Choices programme.

## **Child sexual exploitation (CSE)**

For the purposes of this policy, **“child sexual exploitation”** is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants





- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any child who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes children aged 16 and above who can legally consent to sexual activity. The school will also recognise that children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a child is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

### **Modern slavery**

For the purposes of this policy, **“modern slavery”** encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a child may be the victim of modern slavery. DSLs will also be aware of the support available to victims of modern slavery and how to refer them to the [National Referral Mechanism](#).

### **FGM**

For the purposes of this policy, **“FGM”** is defined as all procedures involving the 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.

All staff will be alert to the possibility of a child being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting children will reflect multi-agency working arrangements.



As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a child under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine children, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that children may be at risk of FGM. While some individual indicators may not indicate risk, the presence of two or more indicators could signal a risk to the child. It is important to note that the child may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a child may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The child coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the child:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of “**honour-based’ abuse (HBA)**”, which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.



## **Forced marriage**

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. A lack of full and free consent can be where a person does not consent or where they cannot consent, e.g. due to some forms of SEND. Where an individual lacks the capacity to consent to marriage, coercion is not required for a marriage to be forced.

All staff will be alert to the indicators that a child is at risk of, or has undergone, forced marriage, including, but not limited to, the child:

- Being absent from school – particularly where this is persistent.
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, performance, exam results or punctuality.
- Being withdrawn from school by their parents.
- Being removed from a day centre when they have a physical or learning disability.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.
- Displaying a sudden decline in their educational performance, aspirations or motivation.

Staff who have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or headteacher and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or headteacher will ensure the child is spoken to privately about these concerns and further action taken as appropriate. Children will always be listened to and their comments taken seriously.

It will be made clear to staff members that they should not approach the child's family or those with influence in the community, without the express consent of the child, as this will alert them to the concerns and may place the child in further danger.

Advice will be sought from the [Forced Marriage Unit](#) following any suspicion of forced marriage among children.

If a child is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The child will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.



Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children’s social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether children at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where children feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment at the appropriate age – Appropriate materials and sources of further support will be signposted to children. Children will be encouraged to access appropriate advice, information and support.

Teachers and other staff members will be educated through CPD about the issues surrounding forced marriage and the signs to look out for.

### **Radicalisation**

For the purposes of this policy, “**radicalisation**” refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, “**extremism**” refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, “**terrorism**” refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting children from the risk of radicalisation is part of the school’s wider safeguarding duties. The school will actively assess the risk of children being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in children’ behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify children who may be at risk of radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.



The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

### **The Prevent duty**

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "**the Prevent duty**". The Prevent duty will form part of the school's wider safeguarding obligations.

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

Children with a family member in prison will be offered pastoral support as necessary. Where known to the school, the child will receive a copy of '[Are you a young person with a family member in prison?](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

### **Children required to give evidence in court**

Children required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Children will be provided with the booklet '[Going to Court](#)' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

### **Mental health**

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

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify children whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how children's experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a child that is also a safeguarding concern will act in line with this policy and speak to the school Mental Health Lead, DSL or deputy DSLs.

The school will access a range of advice to help them identify children in need of additional mental health support, including working with external agencies.



## Serious violence

Through training, all staff will be made aware of the indicators which may signal a child is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a child's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

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

Staff members who suspect a child may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.



## APPENDIX II: HOW CHILDREN CAN REPORT CONCERNS OR ALLEGATIONS

Where there is a safeguarding concern, we will aim to take the child's wishes and feelings into account when determining what action to take and what services to provide, however it will be made to children where this may not be possible, and the reason why.

We recognise the importance of ensuring children feel safe and comfortable to come forward and report any concerns and/or allegations whether child-on-child or otherwise.

To achieve this, we will:

- Put systems in place for children to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for children
- Make it clear to children that their concerns will be taken seriously, and that they can safely express their views and give feedback.

At Ascot Road Primary School children are able to confidentially report safeguarding, child-on-child or any other concerns in the following ways:

### **How children can report concerns or allegations**

- Speak to any member of staff directly.

### **How the reporting systems and processes are shared with children**

- Discussed in PSHE lessons and in whole school assemblies.

### **How children are made to feel safe when submitting concerns**

- All staff understand the importance of fully listening to the concern giving reassurances. Explain clearly the process, how it will be passed onto DSL/DDSL

### **Procedures staff will follow where concerns or allegations are raised by children**

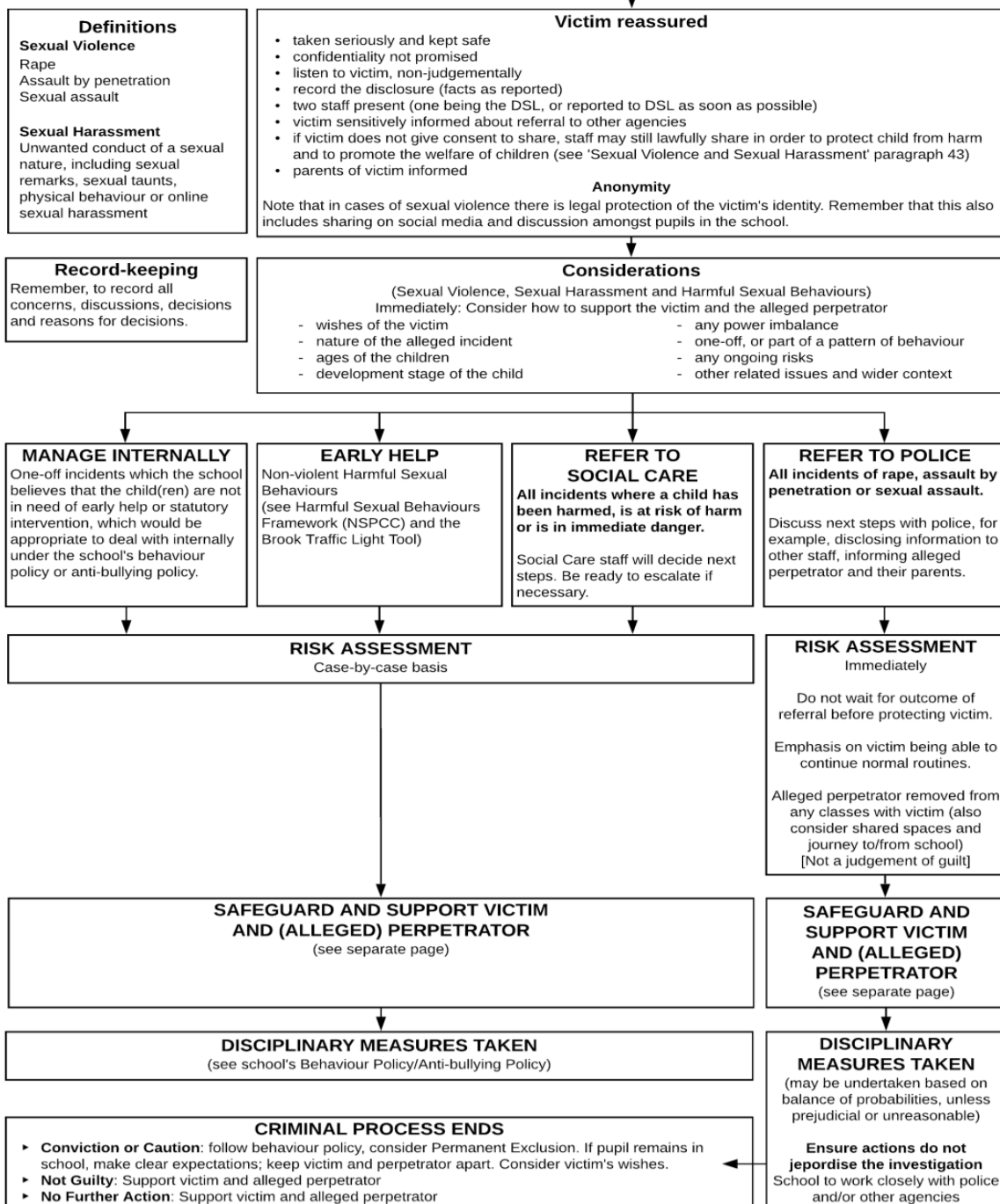
- All staff fully trained on procedures.
- Concerns logged on CPOMS
- DSL/DDSL monitor CPOMS and follow up with necessary actions on the day incident logged
- If further referral needs to be made to county safeguarding team, this takes place within 24 hours.



## APPENDIX III: RESPONDING TO REPORTS OF SEXUAL VIOLENCE & SEXUAL HARASSMENT

### PART FOUR: RESPONSE TO REPORTS

Summary of responses



Source:  
Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2018)

SVSH Flow Chart for Schools 2018 v.1.1





## Safeguarding and supporting victims and alleged perpetrators

Victim	Alleged Perpetrator	Other children
<ul style="list-style-type: none"> <li>• needs and wishes of victim are paramount</li> <li>• not made to feel they are the problem</li> <li>• consider proportionality of response</li> <li>• aim for victim to carry out normal routine</li> <li>• recognise that they may struggle in class and may need time out (if they wish)</li> <li>• be aware that they may not disclose the whole picture immediately</li> <li>• prepare for support over a long period and consider who is involved (internal and external)</li> <li>• if victim moves school, the Designated Safeguarding Lead (DSL) informs the new school of the need for continued support</li> </ul>	<ul style="list-style-type: none"> <li>• possible tension between discipline and support (these are not mutually exclusive)</li> <li>• consider age/ developmental stage/any SEND</li> <li>• proportionate response</li> <li>• consider unmet needs (for example, harmful sexual behaviours (HBV) in younger children may be a sign or abuse or trauma)</li> <li>• if (alleged) perpetrator moves school, the Designated Safeguarding Lead (DSL) informs the new school of the issues and transfers the child protection file</li> </ul>	<ul style="list-style-type: none"> <li>• witnesses may need support (especially in cases of sexual violence)</li> <li>• avoid allowing pupils to 'take sides'</li> <li>• minimise potential for bullying or victimisation in school and on school transport</li> <li>• be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed)</li> <li>• develop safeguarding culture</li> <li>• constantly review reporting procedures and responses</li> <li>• consider potential for systematic and environmental weaknesses</li> </ul>

## Sexual Violence and Sexual Harassment – Implementation Checklist

### Staff Learning and Development

- Senior Leadership Team
- Governing Body
- Designated Safeguarding Leads
- Pastoral Leads
- PSHE/SRE Leads
- All staff

Consider how specialist, external organisations could support the development of staff knowledge and understanding in this area.

### Pupil Curriculum

- Developing healthy, respectful relationships
- What is consent?
- What is sexual violence/sexual harassment?
- Content in SRE/PSHE, other curriculum areas?



## **APPENDIX IV: RESPONDING TO INCIDENTS OF YOUTH PRODUCED SEXUAL IMAGES**

### **Coordinating a response to incidents of YPSI**

All incidents of YPSI will be handled in accordance with the Trust's Child Protection and Safeguarding Policy.

Where a YPSI incident occurs, the school will initiate the following response:

- The incident will be referred to the DSL immediately
- The DSL will hold an initial review meeting with the necessary school staff
- The DSL, and other relevant staff members if appropriate, will conduct interviews with all children involved
- Parents of the children involved will be informed as soon as possible and involved in the school's response, unless doing so would put a child at further risk of harm
- Where a child has been physically harmed, or is at risk of physical harm, the incident will be referred to children's social care and/or the police without delay
- If the incident involves child pornography the police will be informed immediately after the incident has been referred to the DSL

### **The initial review meeting**

During the initial review meeting, the DSL will meet with any and all relevant staff members, and aim to establish:

- Whether there is an immediate risk to the child or children involved.
- If a referral should be made to children's social care and/or the police.
- Whether it is necessary for the DSL to view the imagery and/or message (see guidance later).
- What further information is needed to decide on the best course of action.
- Whether the imagery and/or message has been shared widely and via what services or platforms, e.g. on social media.
- Whether immediate action needs to be taken to delete or remove images and/or messages from devices or other platforms.
- If there are any relevant facts about the children involved that need to be considered when conducting assessment of risk.
- If any other schools, colleges, settings or individuals need to be contacted.
- How parents will be informed and involved in the school's response.

### **Assessment of risk**

Assessing risk will be aided by considering behaviour and the motivations involved in the incident. These can be wide-ranging and move fluidly along a continuum from normal to violent and abusive behaviours. The school will always take into account that isolated inappropriate or problematic behaviour may not always be indicative of a child's overall sexual behaviour. The school will also take into account that harmful sexual behaviour that does not begin as sexually motivated, may arise from this kind of behaviour being normalised within the school culture. Incidents may be described as:



- **Aggravated** – involving abusive elements beyond the creating and sharing of YPSI or involving adult criminal behaviour. This could be with intention to harm such as resulting from break ups, conflict between friends, or criminal threats or blackmail; or with no intention to harm, whereby creating and sharing YPSI is thoughtless or reckless.
- **Experimental** – involving no intention to harm or reckless misuse. This could be in the case of romantic partners who create and share imagery between one another and it is accidentally shared, or instances of ‘sexual attention seeking’.

The following will be considered when assessing risk:

- Why the image and/or message was shared, and whether the child was coerced or put under pressure to produce it
- Who has shared the image and/or message and where it has been shared, i.e. social media platforms
- The impact on the children involved in the incident and whether they have any additional vulnerabilities, e.g. SEND
- Whether the child who produced the image had provided consent and if the image was shared beyond its intended recipient
- Whether the child has taken part in this kind of activity before
- How many children the incident involves and how old they are

The DSL will make an immediate referral to children’s social care and/or police if, at the initial review stage, it is determined that:

- The incident involves an adult.
- A child has been coerced, blackmailed, or groomed, or if there are concerns about their ability to provide consent.
- What the school knows about the incident suggests the content depicts sexual acts that are unusual for the child’s developmental stage.
- The image involves sexual acts and the child in the imagery is under the age of 13.
- The image shows violence.
- The school has reason to believe that a child is at immediate risk of harm as a result of the image and/or message being shared.

Where none of the criteria above apply, the DSL, in conjunction with the headteacher, will determine the appropriate response and may choose not to involve children’s social care or the police; however, if further information comes to light, the DSL may decide to escalate the incident at any stage.

The DSL will only decide not to refer the case to children’s social care and/or the police if they are confident that the risks can be managed effectively by the school. The best interests of the children involved, and their welfare, will be central to the DSL’s decision.

If a child has shared an image and/or message consensually, and there is no intended malice, the school will resolve the incident directly, without involvement from other stakeholders. If a child has shared an image, message or video as a result of interpersonal conflict such as break-ups or fights, the incident will be managed as Child-on-child abuse.

Any incidents caused by an aggravated factor such as where an adult is involved or where there are abusive elements, or where consent has not been provided will involve children's social care and/or police.

### **Resolving YPSI incidents**

If an incident involves children's social care and/or the police, the DSL will resolve the incident in line with their investigation.

The DSL will not usually view any imagery involved in an incident, unless they are satisfied that doing so is:

- The only way to make a decision about whether to involve other agencies.
- Necessary to report the image on a website, app or other reporting agency to have it removed.
- Unavoidable because a child has presented the image directly to a staff member or it has been found on a school device and/or network.

Staff will not view any imagery and instead report it to the DSL.

Where it is necessary to view the image, the DSL will first discuss the decision with the headteacher, and will:

- Not copy, print or share the imagery; this is illegal.
- Ensure viewing is undertaken by themselves or another member of the safeguarding team with permission from the headteacher.
- Ensure the viewing takes place with another member of staff in the room – usually the headteacher, but the other colleague should not also view the image.
- Ensure viewing takes place on the school premises, wherever possible.
- Ensure that images are viewed by an individual of the same sex as the child in the image, wherever possible.
- Record the viewing of the imagery in the school's safeguarding records, which includes the following information:
  - Who was present
  - Why the image was viewed
  - Any actions taken as a result of the image being viewed
  - A date of the staff members who have viewed the image

Once it has been determined that a child is not at immediate risk, the DSL and any other relevant staff members will conduct interviews with all those involved to determine the best course of action. The purpose of these interviews is to:

- Identify what the image contains and whether anyone else has been involved, without viewing the image wherever possible.
- Find out who has seen or shared the content and how further distribution can be prevented.
- The child's views and feelings towards the incident.
- What device the content is on and which device it has been shared from.
- Whether any adults were involved.



The DSL and any other relevant staff members will support and guide the affected children through this process, by reassuring them that they are not alone, identifying with the pressures they are often under to engage in this behaviour, and avoiding victim-blaming. They will assure children that they can always come to them for support.

Support will extend to discussing consent within healthy relationships and the law surrounding indecent imagery if necessary. The DSL will make sure that the law is explained in a way that does not distress or scare the child, and emphasize that it is designed to protect young people, not criminalise them.

Affected parents will be properly supported throughout this process and in the aftermath, including:

- Help on how to speak and listen to their child about such incidents.
- How to deal with their own emotions regarding incidents and access any support.
- How they can discuss issues surrounding consent and trust within healthy relationships.
- Understanding the law surrounding creating and sharing indecent imagery.
- Being kept up to date on any actions that are being taken and any support their child is accessing, unless the child has asked for this not to happen and is old enough to make this decision.
- Being directed to resources to support their child if they are feeling anxious or depressed.

Parents whose child has had their nudes shared will be advised to stay calm and refrain from getting angry, directed to support services like the NSPCC, and advised to speak to the school if bullying is a concern.

Parents whose child has been sent another child's nudes will be advised to listen to their child's concerns and avoid criticising them. Parents will be advised to guide their child through blocking the sender, and discuss consent and trust within healthy relationships.

Parents whose child has shared YPSI will be advised to stay calm and refrain from getting angry at their child, discuss issues surrounding consent within healthy relationships, and contact the school if they are worried with how their child's sexual behaviour.

If the DSL has decided no other stakeholders should be involved, consideration will be given to deleting the imagery and/or message from devices and any other services.

The DSL will not search through devices to delete any content unless there is a clear, good reason to do so.

In most cases, the child will be advised to delete the image and will be asked to confirm when they have done so. They will be given a deadline for deletion across all devices, online storage or social media sites.

All children involved will be informed that possession of this content is illegal and if they refuse to delete the content, or it is later discovered that it has not been deleted, they are committing an offence.



Details of the full incident, including dates, times, persons responsible, persons involved, and persons affected will be held by the school on their Child Protection Management system. This includes the following:

- Outcomes of the initial review meeting
- The assessment of risk
- The response actioned
- Outcomes of the interviews held with children involved
- Any further action taken



## APPENDIX V: CHILDREN MISSING IN EDUCATION (CME) REFERRAL FORM



**CHILDREN'S SERVICES**  
Integrated Services for Learning

CSF4707

### Children Missing Education (CME) Referral Form

Use this form to notify the CME Officer of any child you believe is missing from education. Do not use this form for children who have a school place but are not attending regularly.

*Please use one form per child, unless they are siblings*

Name of referrer | Date

Team/school | Contact number

Child's Name:	DOB	M/F	
---------------	-----	-----	--

Child's Name:	DOB	M/F	
---------------	-----	-----	--

Child's Name:	DOB	M/F	
---------------	-----	-----	--

Address

--

Name(s) of parents/carers      Phone number




DANES EDUCATIONAL TRUST

Other relevant information

Date child(ren) became known to referrer:

This form should be emailed to the appropriate CME Officer, Statutory Attendance & Participation Team via Herts/Schools FX as follows –

West Area – Watford & 3 Rivers, St Albans & Dacorum, Hertsmere – [cme.west@hertfordshire.gov.uk](mailto:cme.west@hertfordshire.gov.uk)

East Area – East Herts & Broxbourne, North Herts & Stevenage, Welwyn, Hatfield  
[cme.east@hertfordshire.gov.uk](mailto:cme.east@hertfordshire.gov.uk)



DANES EDUCATIONAL TRUST