

ST JOHN HENRY NEWMAN CATHOLIC SCHOOL

CHILD PROTECTION AND SAFEGUARDING POLICY

“Our Mission is to be a Living Christian Experience”
“We believe that that everyone thrives in a secure, safe and structured environment”

Extract from School’s Mission Statement

Status:	Statutory
Operational Overview:	Headteacher
Strategic Overview:	Safeguarding, Safety, and Staff
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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Miss Joanna Scouler (Assistant Headteacher)	scoulerj@jhn.herts.sch.uk 01438 314643
Deputy DSL	<p>Mrs Hayley Hewitson (Deputy DSL)</p> <p>Mrs Julia Broom (Deputy DSL)</p> <p>Mr David Carrasco-Morley (Headteacher)</p> <p>Mrs Wendy Howard (Deputy Headteacher)</p> <p>Mrs Ruth Davies (Director of Sixth Form)</p> <p>Mr Joseph Hewitson (Deputy Headteacher)</p> <p>Ms Ana-Maria Fernandes (Director of Learning – Lower School)</p> <p>Mr Lorenzo Medina (Learning Coordinator - Year 7)</p> <p>Mrs Sarah Ince (Mental Health Lead)</p> <p>Mr Simon Miles (Behaviour Mentor)</p> <p>Ms Lauren Hunter (Deputy Director of Sixth Form)</p> <p>Ms Jo Moles (Director of Learning – Upper School)</p>	<p>hewitsonh@jhn.herts.sch.uk</p> <p>broomj@jhn.herts.sch.uk</p> <p>head@jhn.herts.sch.uk</p> <p>howardw@jhn.herts.sch.uk</p> <p>daviesr@jhn.herts.sch.uk</p> <p>hewitsonj@jhn.herts.sch.uk</p> <p>fernandes@jhn.herts.sch.uk</p> <p>medinal@jhn.herts.sch.uk</p> <p>inces@jhn.herts.sch.uk</p> <p>miless@jhn.herts.sch.uk</p> <p>hunterl@jhn.herts.sch.uk</p> <p>molesi@jhn.herts.sch.uk</p> <p>Members of the safeguarding team can also be contacted as a group on dsp@jhn.herts.sch.uk</p>
Local Authority Children's Services		0300 123 4043
Chair of Governors	Mr Kieran Halpenny	halpennyki@jhn.herts.sch.uk
Governor with responsibility for Safeguarding	Mr Michael Treffry	treffrym@jhn.herts.sch.uk
Channel helpline		020 7340 7264

1. Commitment and Aims

At the St John Henry Newman School we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to them about anything that worries them.

We will always act in the best interests of the child.

At the St John Henry Newman School pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

The school aims to ensure that:

- › Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- › All staff are aware of their statutory responsibilities with respect to safeguarding
- › Staff are properly training in recognizing and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- › Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- › [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- › Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

3. Definitions

Safeguarding and promoting the welfare of children means:

- › Protecting children from maltreatment
- › Preventing impairment of children's mental and physical health or development
- › Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

- › Taking action to enable all children to have the best outcomes

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

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

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

Sharing nudes and semi-nudes (also known as youth produced sexual imagery and previously referred to as sexting) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18.

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

- › Hertfordshire County Council: represented by the Director of Children's Services
- › The two local Clinical Commissioning Groups: East and North Herts CCG and Herts Valley CCG: represented by the Director of Nursing and Quality, East and North Herts
- › Hertfordshire Constabulary: represented by the Assistant Chief Constable for Local Policing

4. Equality statement

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

We take into account that children who are at increased risk of abuse include those who:

- › Have special educational needs (SEN) or disabilities (see section 9)
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member's mental health needs
- › Are looked after or previously looked after

5. Roles and responsibilities

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

5.1 All staff

All staff will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- › Our systems which support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education
- › The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- › The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- › What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

Section 13 and appendices of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Miss Joanna Scouller, Assistant Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours, our DSL can be contacted by email on scoullerj@jhn.herts.sch.uk, or via the safeguarding team's group email on dsp@jhn.herts.sch.uk.

When the DSL is absent, the deputies will act as cover as below:

Mrs Hayley Hewitson – Deputy Designated Safeguarding Lead
Mrs Julia Broom – Deputy Designated Safeguarding Lead
Mrs Wendy Howard –DSP/Deputy Headteacher
Mrs Ruth Davies –DSP/Head of Sixth Form
Mr Joseph Hewitson - DSP/Deputy Headteacher
Mr David Carrasco-Morley – DSP/Headteacher
Ms Ana-Maria Fernandes –DSP/Director of Learning – Lower School
Mr Lorenzo Medina –DSP/Learning Coordinator Year 7
Mrs Sarah Ince –DSP/Mental Health Lead
Mr Simon Miles – DSP/Behaviour Mentor
Ms Lauren Hunter – DSP/Deputy Director of Sixth Form
Ms Jo Moles – DSP/Director of Learning – Upper School

If the DSL and deputies are not available, staff should speak to a member of the SLT and/or take advice from local children's social care.

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

- › Provide advice and support to other staff on child welfare and child protection matters
- › Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

- › Contribute to the assessment of children
- › Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

Further references to the DSL in this policy mean the DSL or Deputy DSL or DSP.

5.3 The governing body

The governing body will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The governing body will appoint a senior body level (or equivalent) link governor to monitor the effectiveness of this policy in conjunction with the full governing body. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see section 7.6).

All governors will read Keeping Children Safe in Education Part One.

Section 13 has information on how governors are supported to fulfil their role.

5.4 The headteacher

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

- › Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- › Communicating this policy to parents via the school website
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- › Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- › Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see section 7.6)

6. Confidentiality

The School's approach to confidentiality and data protection with respect to safeguarding and the process and principles for sharing information within the school and Trust and with the 3 safeguarding partners and other agencies is that:

- › Timely information sharing is essential to effective safeguarding
- › Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- › The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- › If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

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

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

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

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

If a child at risk is in immediate danger call 999.

If you are concerned that abuse could be taking place but there is no immediate danger, call 0300 123 4043 or complete a referral form by following the link below:

<https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Report-child-protection-concern.aspx>

Do not assume that someone else will also notice and make a referral.

Additionally, anyone can make a referral by following the link below to the GOV.UK webpage for reporting child abuse to your local council:

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

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible that day in the child's own words. Ideally this should be completed on CPOMS. Stick to the facts, and do not put your own judgement on it. Instructions for using CPOMS can be found on the t drive, in the Staff Guidance Documents Folder. *If you think the concern may be urgent, speak to the DSL first.*
- If not using CPOMS, sign and date the write-up and pass it on to the DSL. The DSL will scan the report and add it to CPOMS. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

If a child has a conversation with you that doesn't amount to a disclosure, but is a concern, it is important to report it to the DSL.

All staff should 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. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

Only members of the Safeguarding Team and Learning Coordinators have full access to CPOMS. If there is a concern about a student who is the child of a member of staff, the Headteacher and DSL may decide to restrict access of some of the Safeguarding Team to that student's CPOMS file. The decision to restrict access and the rationale for this will be recorded on CPOMS.

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

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 2.

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

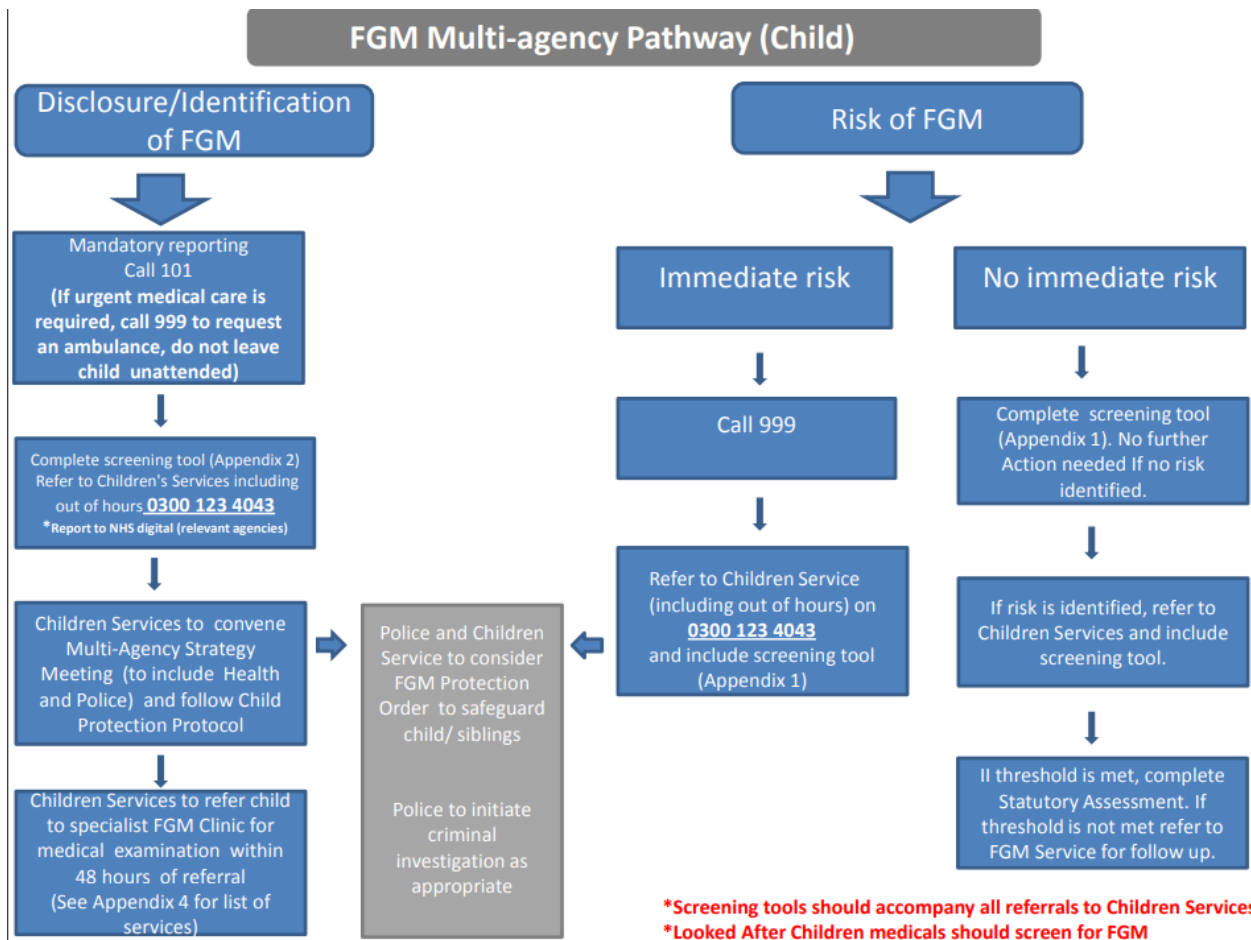
Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **age 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

The pathway below is taken from Hertfordshire's Multi-agency FGM Pathways document:



7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Family First Assessment (FFA) is the Early Help assessment tool used in Hertfordshire. The FFA process is designed to address needs which require a multi-agency response. The FFA process uses a "whole-family" approach, which allows everyone's needs in the family to be taken into account, in order to make a lasting difference.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

To make a referral to Hertfordshire Childrens Service call 0300 123 4043 or complete a referral form by following the link below:

<https://www.hertfordshire.gov.uk/services/Childrens-social-care/Child-protection/Report-child-protection-concern.aspx>

7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

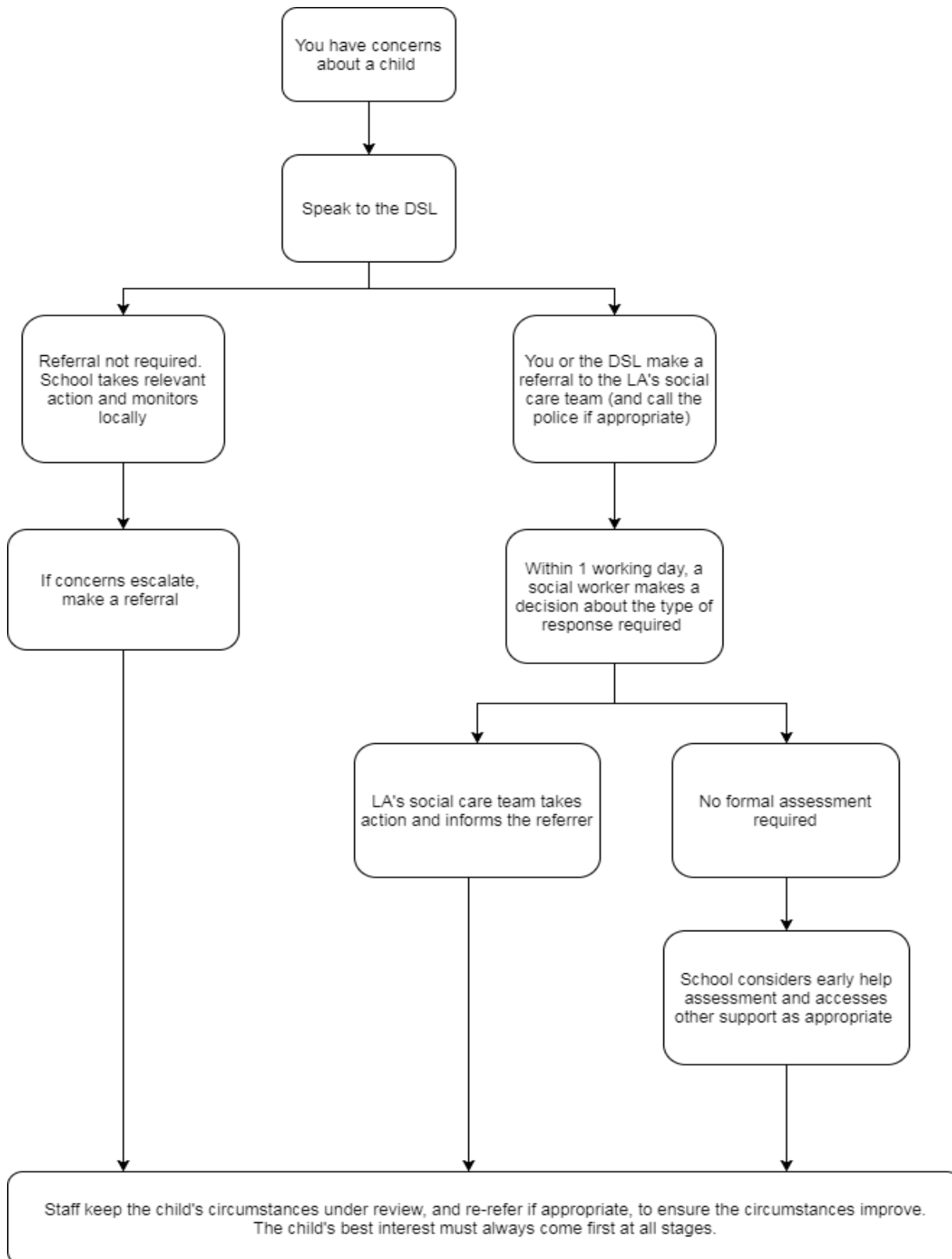
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- › Think someone is in immediate danger
- › Think someone may be planning to travel to join an extremist group
- › See or hear something that may be terrorist-related

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

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



7.6 Concerns about a staff member or volunteer

If you have any concerns about a member of staff or an adult in the school, including governors, volunteers, supply teachers and agency staff, or an allegation is made about a member of staff, governor, supply teacher,

agency staff, or volunteer posing a risk of harm to children, speak to the headteacher (or where that is not possible, to the Designating Safeguarding Lead). If the concerns/allegations are about the headteacher, speak to the chair of governors. It can be difficult to raise this type of concern, but please remember that your piece of information may contribute to a wider picture or pattern.

Concerns may include:

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

This can include the adult's conduct outside school, and need not include a child, for example, domestic abuse of a partner.

We also recognise that there may be lower level concerns that do not reach the 'harm thresholds' listed above. These should also be raised with the headteacher (or the Designated Safeguarding Lead if this is not possible). Staff should also feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. Such concerns might include:

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- Using inappropriate sexualised, intimidating, or offensive language.

This is not an exhaustive list. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

The headteacher/chair of governors will then follow the procedures set out below, if appropriate.

Procedure for dealing with allegations made against staff that may meet the harms threshold

In the event of an allegation that meets the harm threshold criteria (as opposed to lower level concerns) above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

Immediately discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies. Ensure the accused individual understands that resigning will not halt any investigation.

Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as

those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school, for example commencing an investigation under the school disciplinary procedure and/or liaise with the police and/or children's social care services as appropriate

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Individuals affected by facing an allegation or concern, may turn to a trade union representative if they are a member or a work colleague who is not connected to the investigation..

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against employees (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

Keep the parents or carers of the child/children involved informed of the progress of the case.

Make a referral to the DBS and the TRA if the individual is a qualified teacher where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

Where the police are involved, wherever possible the academy trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved

- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Procedure for dealing with lower level concerns

Lower level concerns should be recorded in writing, and records kept confidential and held securely. The headteacher should gather information by speaking directly to the person who raised the concern (where possible), to the individual involved, and to any witnesses. The information collected will help them to categorise the behaviour and determine what further action may need to be taken. This needs to be recorded, along with the rationale for their decisions and action taken. Records should be reviewed so that potential patterns of behaviour can be identified. Where a pattern of behaviour is identified, a course of action will be decided upon. If the behavior is in breach of the staff code of conduct, disciplinary action may be taken.

7.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all child on child abuse is unacceptable and will be taken seriously. Pupils most at risk of abuse by other children are girls, pupils who are LGBT+ or perceived to be LGBT+, and pupils with SEND.

We recognise that even if there are no reports of child on child abuse, it does not mean it is not happening. As such it is important that if staff have any concerns regarding child on child abuse, they should report it to the DSL.

Child on child abuse includes, but is not limited to: bullying (including cyberbullying); abuse in intimate personal relationships; physical abuse; sexual violence; sexual harassment; misogynistic messages; causing someone to engage in sexual activity without consent; sharing nudes and semi-nudes (non-consensual); sharing abusive images and pornography to those who do not want to receive it; upskirting; initiation/hazing type violence and rituals.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- › Is serious, and potentially a criminal offence
- › Could put pupils in the school at risk
- › Is violent
- › Involves pupils being forced to use drugs or alcohol
- › Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sending nudes/semi-nudes), or unwanted sexual comments or touching

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

- › You should reassure the victim that they are being taken seriously and that they will be supported and kept safe. They must not be given the impression that they are creating a problem. You must record the allegation and tell the DSL, but do not investigate it. If the allegation is of a serious assault, you must have a DSL with you to take notes, or a senior colleague if a DSL is not available
- › The DSL will consider the level of concern of the allegation and make a decision about whether the concern can be dealt with within the school, or whether outside agencies need to be involved. The victim's wishes will be taken into account
- › If the incident is of a nature that does not require the input of outside agencies, the DSL will make a decision, consulting with the pastoral team as appropriate, about an appropriate response. This will include supporting the victim, taking into account the wishes of the victim, and supporting and educating the alleged perpetrator. Parents/guardians will be contacted as part of this process.
- › If the allegation is of a serious nature, the DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence. If this is against the wishes of the victim, the reasons for it will be explained to the victim, and support offered
- › The DSL may put a risk assessment or support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of child on child abuse by:

- › Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- › Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensuring pupils know they can talk to staff confidentially by directly approaching the Form Tutor, Learning Coordinator, Assistant Learning Coordinator, Miss Scouller (DSL) and Mrs Howard (Pastoral Deputy Headteacher) or any member of staff they feel comfortable talking to. Alternatively, pupils and parents/carers are encouraged to use the Student Help Advice Reporting Page system (SHARP system) located on the school website. Pupils are regularly reminded of this in Form Time, Assemblies, PSHCE and Parent Support Evenings.
- › Ensuring staff are trained to understand that a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

7.8 Sending nudes/semi-nudes

Your responsibilities when responding to an incident

If you are made aware of an incident involving sending nudes/semi-nudes (also known as 'youth produced sexual imagery' and previously referred to as sexting), whether consensual or non-consensual, you must report it to the DSL immediately. Sharing nudes/semi-nudes can be a sign that a child is at risk.

You must **not**:

- › View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- › Delete the imagery or ask the pupil to delete it
- › Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- › Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- › Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- › Whether there is an immediate risk to pupil(s)
- › If a referral needs to be made to the police and/or children's social care
- › If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- › What further information is required to decide on the best response
- › Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- › Whether immediate action should be taken to report, delete or remove images from devices or online services
- › Any relevant facts about the pupils involved which would influence risk assessment
- › If there is a need to contact another school, college, setting or individual
- › Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- › The incident involves an adult
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- › What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the imagery is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

Informing parents

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

Reporting images

<https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/remove-nude-image-shared-online/>

Parents/children should be advised to report the image using the link above in order to get the image removed online. Only then should the image be deleted. If the incident is being reported to the police, this stage should wait until advised by the Police.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the DSL or Headteacher contacting the safer schools officer, the police community support officer, local neighbourhood police or dialling 101.

Recording incidents

All incidents of sending nudes/semi-nudes and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sending nudes/semi-nudes.

Curriculum coverage

Pupils are taught about the issues surrounding sending nudes/semi-nudes as part of our curriculum. Teaching covers the following in relation to sending nudes/semi-nudes:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

8. Notifying parents

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

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

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

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

9. Pupils with special educational needs and disabilities

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

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

- › Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. This includes: the Learning Support Department and Pastoral Team.

10. Mobile phones and cameras

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

Staff will not take pictures or recordings of pupils on their personal phones or cameras except with the Head's permission, and only for use on school media. Such pictures and recordings should be removed as soon as possible.

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

11. Complaints and concerns about school safeguarding policies

11.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see section 7.6).

11.2 Other complaints

For all other complaints in relation to safeguarding-related issues of other types, for example, those related to pupils or premises, please refer to the Complaints Policy.

11.3 Whistle-blowing

If there are concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures, please refer to the school's Whistleblowing Policy.

12. Record-keeping

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

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

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Safeguarding record-keeping arrangements:

- › Safeguarding concerns along with the action taken are recorded electronically on CPOMS
- › Staff are trained and have individual logins to access CPOMS. In addition, instructions for using CPOMS can be found on the t drive in the Staff Guidance Documents folder.
- › Hand written notes from meetings and relevant documentation are scanned or written up on to CPOMS

- › CPOMS records are transferred electronically from the child's former school and retained until 25 years old.
- › Some records from previous schools are paper files. Where these are small, they are scanned and transferred to CPOMS. Where the size of the file makes this impractical, paper files are kept in a locked filing cabinet in the DSL office.

The school shares information with other agencies when appropriate in line with GDPR and Hertfordshire safeguarding procedures.

In addition, Section 7.6 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

13. Training

13.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

13.2 The DSL and deputies

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

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

They will also undertake Prevent awareness training.

13.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. Training includes Child Protection training, Safer Recruitment, Governance of Safeguarding.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

13.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow safer recruitment procedures.

14. Monitoring arrangements

This policy will be reviewed **annually** by Miss Joanna Scouller, Assistant Headteacher. At every review, it will be approved by the full governing body.

15. Links with other policies

This policy links to the following policies and/or procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Equality
- Relationships and Sex Education
- First aid
- Curriculum
- Privacy notices
- Whistleblowing
- Technology/ICT Acceptable Use Agreement
- Safer Recruitment
- Visitors' Policy
- Emotional Health and Wellbeing Policy
- SEND policy
- Online Safety
- Lettings

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

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

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

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

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

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

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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- › Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- › Protect a child from physical and emotional harm or danger
- › Ensure adequate supervision (including the use of inadequate care-givers)
- › Ensure access to appropriate medical care or treatment

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

Appendix 2: specific safeguarding issues

This appendix is based on the advice in annex A of Keeping Children Safe in Education.

Annex A also includes information on further issues to be aware of, including children's involvement in the court system, children with family members in prison, child criminal exploitation, and domestic abuse.

The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils.

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- › Are at risk of harm or neglect
- › Are at risk of forced marriage or FGM
- › Come from Gypsy, Roma, or Traveller families
- › Come from the families of service personnel
- › Go missing or run away from home or care
- › Are supervised by the youth justice system
- › Cease to attend a school
- › Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

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

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs 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, and/or for the financial advantage or increased status of the perpetrator or facilitator, and/or through violence or the threat of violence.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can occur over time or be a one-off occurrence. CSE can affect any child, including 16 and 17 year olds who can legally consent to have sex.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- › Appearing with unexplained gifts or new possessions
- › Associating with other young people involved in exploitation
- › Isolation from peers/social networks
- › Having older boyfriends or girlfriends or relationships with controlling individuals or groups
- › Suffering from sexually transmitted infections or becoming pregnant
- › Evidence of/suspicions of physical or sexual assault
- › Frequenting areas known for sex work
- › Displaying inappropriate sexualised behaviour
- › Suffering from changes in emotional wellbeing
- › Misusing drugs and/or alcohol
- › Going missing for periods of time, or regularly coming home late
- › Regularly missing school or education, or not taking part in education
- › Excessive receipt of messages/phonecalls
- › Concerning use of internet or other social media
- › Increasing secretiveness around behaviours

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

Potential vulnerabilities include:

- › Having a prior experience of neglect, physical and/or sexual abuse;
- › Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- › Recent bereavement or loss;
- › Social isolation or social difficulties;
- › Absence of a safe environment to explore sexuality;
- › Economic vulnerability;
- › Homelessness or insecure accommodation status;
- › Connections with other children and young people who are being sexually exploited;
- › Family members or other connections involved in adult sex work;
- › Having a physical or learning disability;
- › Being in care (particularly those in residential care and those with interrupted care histories); and
- › Sexual identity.

Criminal Exploitation including County Lines

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

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

Some of the following can be indicators of Child Criminal Exploitation:

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

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, in which drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. network. Other forms of child criminal exploitation can include children being forced or manipulated into working in cannabis factories, shoplifting, pickpocketing, committing vehicle crime, or threatening/committing serious violence to others. Children can easily become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults, and they are not treated as victims. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same. It is important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Like other forms of abuse and exploitation, criminal exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

Homelessness

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

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

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

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out

➤ A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

➤ A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

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

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- › Refusal to engage with, or becoming abusive to, peers who are different from themselves
- › Becoming susceptible to conspiracy theories and feelings of persecution
- › Changes in friendship groups and appearance (but there are also very powerful narratives, programmes and networks that young people can come across online, so involvement with particular groups may not be apparent)
- › Rejecting activities they used to enjoy
- › Converting to a new religion
- › Isolating themselves from family and friends
- › Talking as if from a scripted speech
- › An unwillingness or inability to discuss their views
- › A sudden disrespectful attitude towards others
- › Increased levels of anger
- › Increased secretiveness, especially around internet use
- › Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- › Accessing extremist material online, including on Facebook or Twitter, or sharing extremist messages or social profiles
- › Possessing illegal or extremist literature
- › Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations
- › Glorifying violence, especially to other faiths or cultures or advocating violence towards others
- › Making remarks or comments about being at extremist events or rallies outside school
- › Graffiti, art work or writing that displays extremist themes

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Private Fostering

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

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

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

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

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

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

Domestic Abuse and Operation Encompass

The definition of Domestic Abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

It is important to note that abuse of children can include the impact of witnessing the ill treatment of others. In April 2021 the Domestic Abuse Bill recognised that a child who sees, hears, or experiences the effects of domestic abuse, and is related to the victim or perpetrator of domestic abuse, is also to be regarded as a victim of domestic abuse

Our school is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience domestic abuse.

Operation Encompass means that the police will share information about domestic abuse incidents with our school prior to the start of the next school day when they have been called to a domestic incident.

In the context of Operation Encompass the DSL is known as the Key Adult, and is trained to respond to a police notification of domestic abuse and take appropriate actions. The Key Adult also ensures that staff are trained to understand the impact of domestic abuse on children, and how we can support our children following an Operation Encompass notification.

We are aware that we must do nothing that puts the children or the non-abusing adult at risk.

Online Safety

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many pupils are able to access the internet using their own data plan. To minimise inappropriate use, as a school we use a web filtering service which blocks inappropriate content. This is compliant with government standards. For students to access the school's wireless internet connection they are required to authenticate.

School staff visually monitor IT use in the classroom, and ICT support staff use monitoring software to identify concerns. Filtering and monitoring concerns are reported on CPOMS.

The school will do all it reasonably can to keep children safe online at home. Where staff are interacting with children online, they will continue to follow our existing staff code of conduct, Technology Acceptable Use agreement, and Social Media Guidance. Staff must use school email addresses only when communicating with pupils and students. Pupils and students should be reminded to use school email addresses.

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Know where else they can go for support to keep their children safe online.

We will include online safety training for staff as part of our safeguarding training. This includes understanding their responsibilities in relation to filtering and monitoring, and cybersecurity. Pupils are also taught about online safety.

Mental Health

All staff at the St John Henry Newman Catholic School are 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 have received training in mental health/emotional wellbeing, and some staff are trained in Mental Health First Aid.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the DSL or a deputy. This can be done via CPOMS, but if it is urgent, the DSL or a deputy should be spoken to without delay.

Procedures surrounding mental health and emotional wellbeing can be found in the Emotional Health and Wellbeing Policy.

Children with a Social Worker

At the St John Henry Newman Catholic School, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker. For example, we may make a referral to our wellbeing support team, or make teaching staff aware of pupil vulnerabilities without going into unnecessary detail.

Searching, and Children being searched by a Police Officer

Only the Headteacher, or a member of staff authorised by the headteacher, can carry out a search of a pupil. There must be two members of staff present for a search, including a senior member of staff. The law states that the member of staff conducting the search must be of the same sex as the pupil being searched. There

is a limited exception to this rule. This is that a member of staff can search a pupil of the opposite sex and/or without a witness present only:

- if the member of staff carrying out the search reasonably believes there is risk that serious harm will be caused to a person if the search is not carried out as a matter of urgency; and
- in the time available, it is not reasonably practicable for the search to be carried out by a member of staff who is same sex as the pupil or it is not reasonably practicable for the search to be carried out in the presence of another member of staff.

When a member of staff conducts a search without a witness they should immediately report this to another member of staff.

A member of staff may search a pupil's other clothing, pockets, possessions, bags, or lockers. The pupil must not be required to remove any clothing other than outer clothing. 'Outer clothing' means any item of clothing that is not worn wholly next to the skin or immediately over a garment that is being worn as underwear, as well as hats, shoes, boots or scarves. The search must take place in the presence of the pupil and the second member of staff, except where there is a risk that serious harm will be caused to a person if the search is not conducted immediately and where it is not reasonably practicable to summon another member of staff.

Headteachers and staff they authorise have a statutory power to search a pupil or their possessions if they have reasonable grounds for suspecting that the pupil is in possession of a prohibited item listed below:

- a knife/weapon
- alcohol
- illegal drugs
- stolen items
- an article that is suspected to have been or is likely to be used to commit an offence or cause personal injury or damage to property
- tobacco
- fireworks
- pornographic images

The DSL or deputy should be informed of any searching incidents where the member of staff had reasonable grounds to suspect a student was in possession of one of the above items. The DSL or deputy should also be informed without delay if they believe that a search has revealed a safeguarding risk.

Under common law, school staff have the power to search a pupil for any item if the pupil agrees.

Staff should ensure that the pupil understands the reason for the search and how it will be conducted, and give them the opportunity to ask questions.

If a pupil refuses to cooperate with a search, the reasons for this should be considered. The pupil could: be in possession of a prohibited item; not understand the instruction; be unaware of what a search may involve; have had a previous distressing experience of being searched. If they continue to refuse to cooperate, the pupil may be sanctioned in line with the school's behaviour policy, and the advice of senior colleagues should be sought whilst the pupil is kept supervised and away from other pupils. If the pupil still refuses to cooperate, staff should consider if it is appropriate to use reasonable force to conduct the search, but only for the prohibited items listed above.

Strip searches can only be carried out by police officers under the under the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C. 12 While the decision to undertake the strip search itself and its conduct are police matters, school staff retain a duty of care to the pupil(s) involved and should advocate for pupil wellbeing at all times.

Before calling police into school, staff should assess and balance the risk of a potential strip search on the pupil's mental and physical wellbeing and the risk of not recovering the suspected item. Staff should consider whether introducing the potential for a strip search through police involvement is absolutely necessary, and should always ensure that other appropriate, less invasive approaches have been exhausted. Once the police

are on school premises, the decision on whether to conduct a strip search lies solely with them, and the role of the school is to advocate for the safety and wellbeing of the pupil(s) involved.

Unless there is an immediate risk of harm and where reasonably possible, staff should inform a parent of the pupil suspected of concealing an item in advance of the search, even if the parent is not acting as the appropriate adult. Parents should always be informed by a staff member once a strip search has taken place. Schools should keep records of strip searches that have been conducted on school premises and monitor them for any trends that emerge.

The School is aware of the requirement for a child who is being searched by a Police Officer to have an appropriate adult present. The role of the appropriate adult is to safeguard the interests, rights, entitlements, and welfare of children and vulnerable people who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner, and are able to participate effectively. Appropriate adults are expected to be an active participant, be assertive and speak up. The School will make every possible attempt to contact parents/guardians in the event of a student being searched by the Police, and will only take the role of appropriate adult if it has not been possible to contact parents/guardians and have them or their nominated choice of appropriate adult present. The school will refer to government guidance on Searching, Screening, and Confiscation July 2022 to ensure that the correct procedure is being followed.

Responsibilities of an appropriate adult include:

- To ensure that the child or young person understands their rights and that you have a role in protecting their rights
- To be present when police request consent for, or carry out, various procedures such as fingerprinting, photographing, intimate and strip searches
- To observe whether the police are acting properly, fairly and with respect for the rights of the child or young person and to tell them if they are not

If the Police attend the School to see a child who is suspected of a crime:

- The School will record its actions and the reasons for them (eg if the school called the police and why).
- The School will consider why the police have been asked to attend.
- The School will ask what their planned actions are, and ask questions if their actions are different to those planned.
- The School will ask the police whether a parent should attend.
- The School will ask the police if an 'appropriate adult' is required.
- The School will keep timed and detailed records of events.

If the Police attend the school to see a child for a reason other than they are suspected of a crime:

- The School will record actions and reasons for them (eg that we are calling the police and why, or why the police are seeing a child).
- The School will ask the police whether a parent should attend.
- The School will ask the police if an 'appropriate adult' is required.

Use of School Premises for non-school activities

The School uses a lettings agency for hiring out the premises for non-school activities. The School has inspected the agency's Safeguarding Policy to ensure that there are safeguarding arrangements in place for any activities for which the premises are used. The lettings agency is aware that any allegations against adults when the premises are let must be reported to the School, and that the School will follow its usual procedures for managing allegations against adults, which may include making a referral to the LADO.