

## Safeguarding Policy

### Schedule for Development / Monitoring / Review

This previous Safeguarding Policy was approved by the Trustees on:	<b>Autumn 2021</b>
The implementation of this policy will be monitored by the:	SLT
Monitoring will take place:	Annually
The Trustees will receive a report on the implementation of the Safeguarding Policy at regular intervals and at least:	Annually
This Safeguarding Policy will be reviewed annually, or more regularly in the light of any significant new developments. The next anticipated review date will be:	<b>Autumn 2022</b>
Should any Safeguarding concerns or incidents occur as stated by the policy we will contact:	GSCE Police
<i>This policy is posted on the school website</i> THIS POLICY APPLIES TO THE SENIOR SCHOOL	

### Rationale

The School has a legal obligation to work with other agencies in the protection of children from harm. This policy has been written with due regard to the DFE (Department for Education) statutory guidance '**Working Together to Safeguard Children July 2018**', is compliant with the DFE publication, 'Safeguarding Children and Safer Recruitment in Education' and other associated guidance. It is in accordance with the Gloucestershire Safeguarding Children's Executive (formerly known as Gloucestershire Safeguarding Children Board, GSCB). This policy was updated in September 2021 to follow the '**Keeping Children Safe in Education**' statutory guidance document produced by the DFE for September 2021 and 'Prevent Duty Guidance for England and Wales (July 2015)' and 'The use of social media for on-line radicalization (July 2015)'

The policy is available on the School Website. Parents are advised that the School has a Safeguarding Policy through the New Parents' Information Handbook and that they have the right to receive a copy of this statement and of the implementation procedure in hardcopy by request.

Safeguarding is now everyone's responsibility and should be child-centric and creating an active safeguarding culture is vital.

. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 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; and
- taking action to enable all children to have the best outcomes

Children includes everyone under the age of 18.

*The aim of the policy is to develop a culture of safety, equality and protection and ensure that all staff always act in the best interest of the child. All staff have the responsibility to provide a safe environment in which children can learn and all staff should be prepared to identify children who may benefit from early help. Providing support as soon as the need emerges can prevent concerns from escalating. This policy should be read in conjunction with the School E-Safety Policy which outlines the provision for teaching children to keep themselves safe on line.*

## **Useful Contacts when Concerned about a Child**

**Designated Safeguarding Lead [DSL]** is the Senior Deputy Head **Mr John Lewis** (Mobile: **07920016719** or e-mail: [j.lewis@stedwards.co.uk](mailto:j.lewis@stedwards.co.uk)). The designated person follows locally agreed inter-agency procedures.

**Deputy DSL** is **Mrs Leanne Huxtable** [l.huxtable@stedwards.co.uk](mailto:l.huxtable@stedwards.co.uk) who deputises in the absence of the DSL

**Mrs Jane Jones** is the **Designated Trustee** who supports the School's Safeguarding procedures and she is contactable via the Clerk to the Trustees, via the Main Office on **01242 388555** or [j.jones@stedwards.co.uk](mailto:j.jones@stedwards.co.uk)

Mr **Paul Potts** is the **Deputy Designated Trustee** for Safeguarding [p.potts@stedwards.co.uk](mailto:p.potts@stedwards.co.uk)

The **GSCB** (Gloucestershire Safeguarding Children Board) now called the **GSCE** (Gloucestershire Safeguarding Children's Executive) helpdesk (now called the Front Door) number is **01452 42 6565**. (Now replaced by responsibility of three 'safeguarding partners'. These are the local authority (Gloucestershire), a clinical commissioning group (CCG) in the area and the chief of police for the local force. The safeguarding partners will select 'relevant agencies' whose involvement they require. Those agencies will then come under a statutory duty to co-operate and act in accordance with the published local arrangements.

Any concerns relating to **Female Genital Mutilation (FGM)** must be reported to the local Police on **101**.

Concerns relating to **Terrorism** must be reported to the CHANNEL programme on **020 7340 7264**

## **The Designated Safeguarding Lead**

The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of policies and procedures in practice.

### **The main responsibilities of the DSL are:**

- To be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection and to provide support, advice and expertise on all matters concerning safeguarding
- To put in place mechanisms to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of the KCSIE guidance.
- To co-ordinate the safeguarding procedures in the School and to review and update regularly the procedures and implementation of the procedures, working with the Trustees as necessary
- To ensure that all members of staff and volunteers receive the appropriate training on safeguarding and safer recruitment procedure and to keep and maintain records of this training. This will include the Safeguarding policy, the Personal and Professional Code of Conduct, Whistleblowing, Prevent, function of the DSL and part 1 of KCSIE including Annex A, where appropriate.
- To ensure that staff receive regular safeguarding and child protection updates as required but at least annually.
- To support the on-line training of the catering and cleaning staff along with the Bursar
- To take a proportional risk based approach to the level of information that is provided to temporary staff and volunteers,
- To link with the GCSE (formerly GSCB) & (local safeguarding partners) to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- The DSL and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- To advise and act upon all suspicion, belief and evidence of abuse reported to the DSL
- To liaise with the Local Authority Designated Officer (LADO) Nigel Hatten, children's social care and other external agencies on behalf of the School, including the police and the Disclosure and Barring Service (DBS)
- Keep the Principal informed of all actions unless the Principal is the subject of a complaint
- To monitor the keeping, confidentiality and storage of records in relation to child protection and when a child leaves, ensure their child protection file is copied for the new school as soon as possible and transfer it separately from the main pupil file. This includes ensuring that information to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of any needs.
- To monitor records of pupils in the School who are subject to a child protection plan to ensure that this is maintained and updated as notification is received
- To liaise with other professionals to ensure that children who are subject to child protection plans are monitored and, where appropriate, to take part in child protection conferences or reviews.

- Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
- To be the SPOC (Single Point of Contact) in the case of a **Prevent** concern relating to radicalisation or potential involvement in terrorism.
- To inform the local **Prevent Lead** (LADO: at GSCE) of any concerns relating to radicalisation or extremism. (Or call 101 if PL is not available).
- To refer any terrorism concerns to the **CHANNEL** programme via the Police on 101. (LADO, at GSCE must also be informed).
- To organise the teaching of safeguarding and on-line safety to pupils and help pupils to build resilience to the risks of radicalisation. (The PSHE programme will be at the heart of this teaching but will be supported with extra activities including regular assemblies and visiting speakers/workshops).E.g. Chelsea's Choice, a drama group dealing with CSE (Child Sexual Exploitation).
- Liaise with the e-safety coordinator on a regular basis and the Infra Structure Manager with regard to filtering reports and online safety
- To make sure that all staff are familiar with the CPOMS software for recording incidents and concerns.

The DSL is the Senior Deputy Head and so has timetable remission commensurate with the role. The DDSL would be provided with additional time in order to satisfy the role in the absence of the DSL.

The School's records on child protection are kept locked in the Senior Deputy Head's office and are separated from routine pupil records. Access is restricted to the DSL and the Principal. Safeguarding data will also be stored in CPOMS but access will be restricted to the DSL and the Principal via secure log in.

## Staff Responsibilities/Awareness

1. **Any** child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:
  - is disabled and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
  - is frequently missing/goes missing from care or from home
  - is at risk of modern slavery, trafficking or exploitation
  - is at risk of being radicalised or exploited
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing drugs or alcohol themselves
  - has returned home to their family from care
  - is a privately fostered child

2. **All** staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Indicators of abuse and neglect, and examples of safeguarding issues are described in this document. Our pastoral system gives the opportunity for children to be heard by tutors, PAC (Pastoral & Achievement Coordinator), Heads of Section, School Nurse, Chaplain, visiting Counsellors and the Mental Health & Wellbeing Nurse or indeed any member of staff.
3. **All** staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
4. Staff are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff must always act in the **best** interests of the child.
5. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they must always speak to the designated safeguarding lead (or deputy).

#### **Looked after Children (LAC)**

Any Looked After Child at the School must be treated the same and staff must have the skills, knowledge and understanding necessary to keep them safe. The DSL must receive all the necessary documentation and details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

#### **What staff should do if they have concerns about a child**

1. **If staff have any concerns about a child's welfare, they must act on them immediately by contacting the DSL.** If the DSL is not available, staff should speak to the Deputy DSL. In the exceptional circumstance that neither the DSL or Deputy DSL are available, staff should speak to the Principal or a member of the Senior Leadership Team.
2. **Staff must not assume a colleague or another professional will take action and share information that may be critical in keeping children safe.** They must be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. The document 'Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People and Carers' supports staff who have to make decisions about sharing information. Any doubt about information sharing can be discussed with the DSL. 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.
3. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.**
4. **Female Genital Mutilation [FGM]** – there are mandatory reporting duties for teachers. All staff should speak to the DSL with regard to any concerns about FGM, there is a specific legal duty to report this to the police. Therefore, if a teacher in the course of their work discovers an act of

FGM appears to have been carried out on a girl under the age of 18 years, this must be reported to the police. See Annex A, KCSIE 2021 for further information.

5. **Suspected abuse** of any kind is reported to the DSL **and not investigated by the member of staff**. (Any member of staff must make a direct referral if they are not satisfied with the actions of the DSL. The NSPCC Whistleblowing helpline number is: 0800 028 0285 between 8am and 8pm Monday to Friday and email [help@nspcc.org.uk](mailto:help@nspcc.org.uk) **The School should consider at all times what is in the best interests of the child.**
6. Physical abuse, Emotional abuse, Sexual abuse, Peer on Peer abuse or Neglect is reported by the teacher to the DSL. If the child needs immediate medical attention then the DSL must contact a GP, or a hospital for treatment. Parental consent is **not** required for this.
7. For any cases of abuse the **CYPS** (Children & Young People's Services) must be contacted on 01242 634050. The incident can be discussed with the social care practitioner on that number either for advice, or if the evidence is clear enough, to make a referral. Advice must be taken from the CYPS as to whether the parents are informed or not. If contact with the CYPS is deemed appropriate by the DSL it will be made within 24 hours of the concerns coming to him. This TAC (team around the child) support will provide appropriate and co-ordinated early help for the child.
8. All staff must be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff must discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment.
9. The DSL accurately records any concerns, and/or the child's comments at the time and these are dated. They are retained (confidentially) as further concerns may be raised later.
10. The DSL may be asked to arrange for a child to be interviewed to substantiate the concern. This must be carried out by a member of staff who has received appropriate training and guidance.
11. If concern is substantiated, then any further investigation are carried out by Social Workers or Police officers.
12. **At no time is the alleged abuser contacted.**
13. Staff must be aware that the threshold for dealing with an issue of pupil behaviour or bullying under the safeguarding policy is when there is '**reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm**'. Any such abuse will be referred to the GSCE (or partner agencies).

### **What Staff should do if they have a concern about another member of staff who may pose a risk of harm to children**

If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, then:

1. This must be referred directly to the Principal, who will then notify the DSL (unless the DSL is the subject of the concern)
2. The Principal (or in the Principal's absence the Chair of Trustees), must contact the Local Authorities Designated Officer, LADO (**01452 426994**) within one working day at the latest. The LADO will follow the procedure as laid down in 'Working together, 2018' and advise the School accordingly. The School will not undertake its own investigations of allegations without prior consultation with the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO(s) can often be held informally and without naming the school or individual.
3. Immediate contact should be made with the LADO(s) to discuss any allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. **GDPR cannot be allowed to stand in the way of safeguarding children.** Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. The School must consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The School will give due weight to the views of the LADO, KCSIE and WT when making a decision about suspension. (Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer).
4. Where there are concerns/allegations about the Principal, this must be referred to the Chair of Trustees without informing the Principal.
5. Any complaint made against a member of staff or a volunteer must be made to either the Principal or Senior Deputy Principal (DSL) who then meet to discuss the appropriate procedure.
6. In case of serious harm, the police must be informed from the outset.
7. As there are restrictions on the reporting or publishing of allegations against teachers, the School must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/TRA publish information about an investigation or decision in a disciplinary case. Following the publication of *Dealing with allegations of abuse against teachers and other staff*, procedures are followed with common sense and judgement. See Appendix 2 below.
8. If a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the School will make a referral to the Disclosure and Barring Service (DBS)
9. The School is committed to report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child; satisfied the harm test; or received a caution or conviction for a relevant offence.

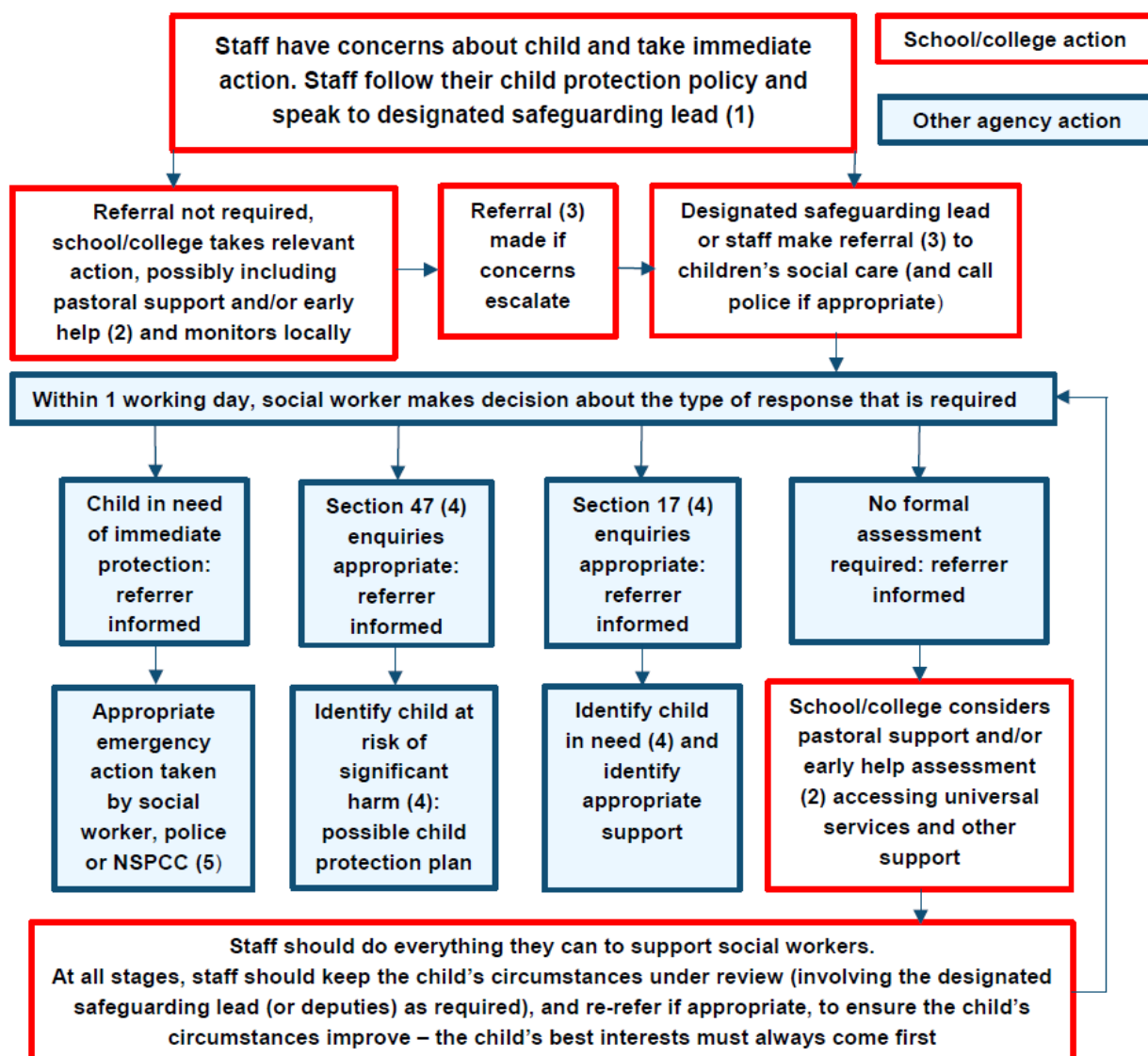
Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. Reports must include as much evidence about the circumstances of the case as possible. 'Compromise agreements' cannot be used to prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation.

### **What staff should do if they have concerns about safeguarding practices within the School**

1. All staff and volunteers must feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and know that such concerns will be taken seriously by the Senior Leadership Team.
2. The member of staff must refer to the Whistleblowing Policy
3. Where a staff member feels unable to raise an issue with the Principal, Chair of Trustees, DSL or member of the Senior Leadership Team or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:
  - General guidance on whistleblowing can be found via: 'Advice on Whistleblowing'.
  - The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the School. **Staff can call 0800 028 0285** – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)



## Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

## What staff should do if a child makes a disclosure

- If a child begins to disclose information to staff it is very important that **confidentiality is not promised** to the child. This point needs to be made tactfully to the child as soon as is practical in any discussion.
- It is also very important that staff **do not** ask leading questions.

## Child's rights during an investigation

1. All those involved in Safeguarding investigations must act throughout in the best interests of the child or young person.
2. Children and young people are entitled to be protected from harm and neglect.
3. Children must be listened to and treated with respect.
4. The views and wishes of the child must be sought. However, the child's best interests may mean that action has to be taken against the child's wishes. The reason for this must be carefully explained to the child.
5. Children and young people must always be given explanations for the actions taken to protect them.
6. Children and young people must not be repeatedly interviewed about the same events.
7. Children and young people's consent must be obtained before a video recording of an interview is made or before a medical examination.
8. Medical examinations must only be undertaken by an external safeguarding agency.
9. **Children who are felt to be at risk of harm are given a Safeguarding (Child Protection) Plan. A list of those children for whom this is the case is kept by the Gloucestershire Safeguarding Children Service.**

## Guidance for staff on how to minimize risk

It is important that staff do not leave themselves at risk of harm or of allegations of harm to a pupil. Staff must consult the **Personal and Professional Code of Conduct for members of Staff** - Appendix 3). Whilst recognising that St. Edward's School provides a wide range of activities at various times of the day, and in various venues, staff must be mindful of managing that risk.

Examples of situations where this may be more relevant might include;

- One-to-one tuition
- Sports coaching
- Conveying pupils by car
- Electronic communication, e.g. texts and email, social media platforms

Examples of actions that staff must take to minimize such risk might include;

- Informing colleagues of their whereabouts and situation
- Minimising time spent one-to-one with a student
- Asking colleagues to 'check in' on them occasionally

- Keeping doors open
- Checking that emails/texts cannot be misconstrued. Staff must only communicate with pupils via their school email address. Staff must only text pupils from a school mobile phone.
- Photographs of pupils must only be taken on a school camera or school electronic device and **never** on a private camera/device.

## The use of 'reasonable force'

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means '**using no more force than is needed**'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances. **There is further guidance from the DFE on the 'Use of reasonable force in schools'**

## Indicators of abuse and neglect

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Physical abuse:** a form of abuse which 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:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature 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 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 children frequently to 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, although it may occur alone.

**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. They may also include 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. Sexual abuse can take place online, 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. The sexual abuse of children by other children is a specific safeguarding issue in education (Peer on Peer Abuse).

**Neglect:** 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, for example, 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Staff are aware that criminal exploitation of children is a geographically widespread form of harm that is a typical feature of **county lines** criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. If staff suspect a child under their care is being used for criminal exploitation, they must advise the DSL who will follow local guidance from GSCP and or the Police.

**Peer on peer abuse:** Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. Staff must recognise the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously. See the procedures for tackling peer-on-peer abuse.

## **Upskirting:**

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

**Mental Health:** All staff should also be 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. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the Safeguarding policy and speaking to the designated safeguarding lead or a deputy.

## **Managing risks of self-harm:**

Safeguarding children may mean protecting them from self-inflicted harm. A pupil who self-harms may not be at serious risk but will still need support. However, it is important that those caring for the pupil be aware of dark thoughts, depression, anxiety and any self-harm or suicidal thoughts, in order to provide proper support, monitoring and protection. Accordingly, any member of staff who becomes aware that a pupil is harming him/herself or is thinking of doing so must inform the DSLs. They will then determine what, if any, further action must be taken.

## **Online safety:**

As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. As such, the Trustees should ensure appropriate filters and appropriate monitoring systems are in place.

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

Staff are aware that these children are more at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Further information and guidance for staff and families can be found on the School's Safeguarding tab on the VLE or parent portal.

## **Honour Based Violence (HBV) or Honour Based Abuse**

**Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.**

It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage

- wear clothes or take part in activities that might not be considered traditional within a particular culture

### **What types of honour based crime are there?**

The term 'honour based crime' covers any criminal offence that is driven by a mistaken desire to protect the cultural or traditional beliefs of a family or community. **It may or may not involve violence.** It can include:

- personal attacks of any kind, including physical (such as breast ironing) and sexual violence
- forced marriage
- forced repatriation (sending someone back to a country from which they originate without their consent)
- written or verbal threats or insults
- threatening or abusive phone calls, emails and instant messages

Honour based violence or Abuse is not right and certainly is not legal. It is particularly under-reported, as often victims are too scared, shocked or tied by family or community loyalties to speak out. Any member of staff who feels that any type of Honour Based Violence or Abuse has taken place to a child at the School, both the School's DSL and the Police must be notified. The DSL will also notify the LADO.

### **Sexting**

Sexting (also known as youth produced sexual imagery) is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone; whatever their age, gender or sexual preference.

Taking, possessing or sharing a sexually explicit picture or video of someone under 18 is against the law. It doesn't matter if they gave you permission, someone else sent it to you, you've never met them before, you are under 18 too or it's a selfie. You and anyone else involved could be investigated by the police.

### **Sextortion**

Sextortion is a type of exploitation that involves coercion to extort sexual images/favours from the victim

**Child Exploitation Online Protection Centre (CEOP) has recently updated their sexting guidance and must be read by all staff. Staff must also access NOS training at <https://nationalonlinesafety.com/hub/view/webinar/sexting>**

### **Specific safeguarding issues**

1. **All** staff must have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.
2. **All** staff must be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:
  - bullying (including cyberbullying);
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - sexual violence and sexual harassment;
  - sexting (also known as youth produced sexual imagery); and

- initiation/hazing type violence and rituals.
3. **All staff must be clear as to the School's policy and procedures with regards to peer on peer abuse.**

### **Procedures for tackling peer-on-peer abuse**

Abuse by one or more pupils against another pupil is a serious safeguarding concern.

The emphasis is upon creating the right culture supported by robust processes that are well understood.

When there is reasonable cause to suspect that a child is suffering, or likely to suffer, **significant harm**, the School reports its concerns to the local authority as a child protection concern. **Abuse must never be tolerated or passed off as 'banter'**. (Details of how to support the child can be found in the Anti-Bullying Policy)

#### **Staff must**

- not promise confidentiality
- listen,
- be non-judgemental,
- not lead,
- take notes
- staff must not view or forward illegal images of a child. See DfE guidance on Searching, Screening and Confiscation and the UKCCIS sexting advicereport to **DSL as soon as possible**

(The DSL will arrange clear record keeping that helps in identifying patterns and potentially wider issues. Written records must be kept for all incidents of sexual violence and harassment; the concerns must be logged along with actions taken.

#### **If abuse of a child by another child or children is discovered (rather than bullying) the CYPS must be contacted for advice.**

It is an expectation that in the event of disclosures about pupil-on-pupil abuse that all children involved, whether perpetrator or victim, are treated as being 'at risk'. Advice about sexting in schools is available from the UK Council for Child Internet Safety (UKCCIS): 'Sexting in schools and colleges'.

#### **Sexual violence and sexual harassment between children in school.**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk. **All peer on peer abuse is unacceptable and will be taken seriously.**

Staff must be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Staff must be aware that children with SEN/D (Special Educational Needs and Disabilities) may be particularly vulnerable to abuse. There may be additional barriers to recognizing abuse and neglect in this group of children. It should not be assumed that indicators of possible abuse, such as behaviour, mood or injury relate to a child's disability, without further exploration. Children with SEN/D may be disproportionately impacted by abuse without outwardly showing any signs, and they may face additional difficulties in communicating what is happening to them.

### **Child Sexual Exploitation**

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

Factors that increase a child's susceptibility to Child Sexual Exploitation are

- Emotional neglect by parent/ carer/ family member
- Physical abuse by parent/ carer/ family member
- Sexual abuse
- Breakdown of family relationships
- Family history of domestic violence
- Family history of substance misuse
- Family history of mental health difficulties
- Low self-esteem
- Unsuitable/ inappropriate accommodation
- Isolated from peers/ social networks
- Lack of positive relationship with a protective/ nurturing adult

### **Other issues that may affect children's wellbeing**

Many families manage to bring up their children in a warm loving supportive environment in which the child's needs are met and they are safe from harm. For some, sources of stress within the families can have a negative impact on a child's health, development and wellbeing. Research tells us that such sources of stress may include the following:

**Social Disadvantage.** Some families are socially disadvantaged and directly affected by poverty. They may live in poor housing, be vulnerable to accidents, have poor diet and health problems, lack of access to good educational opportunities or leisure facilities, transport etc. Racism and racial harassment are an additional source of stress.

**Social Isolation** Some families may be socially isolated because of their family circumstances. This might be physical isolation, because of where they live, or it might be isolation due to circumstances such as family breakdown, lack of a close family support network, stigma, secrecy or fear.

**Domestic Abuse.** Prolonged or regular exposure to domestic abuse can have a serious impact on a child's development and emotional wellbeing. There are many significant ways that domestic abuse can have an impact: ► As a threat to an unborn child where physical assault poses a threat



to foetus and mother. ► Through physical injury where children have got in the way or been injured intentionally. ► By causing emotional harm and damage to children who witness the physical and emotional suffering of a parent. ► By causing emotional impairment to children hearing the ill-treatment of another. ► Neglect through impaired parenting capacity, or abuser controlling access to resources The risks are increased if alcohol is a trigger for abuse.

**Operation Encompass** operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

**Mental Illness of Parent or Carer.** It is important to stress that mental illness does not necessarily have an adverse effect on a child but it may restrict a child's social and recreational activities especially if the child takes responsibility for caring for their parent in a way that is inappropriate to their age. If depressed, a parent may neglect their children's physical and emotional needs. Occasionally a child may be at risk of extreme violence or even death. Out of 100 recent child death reviews (Cleaver H et al 1999), mental illness was found to be a factor in a third of them.

**Drug and Alcohol Misuse.** Drug and alcohol misuse by a parent or carer does not necessarily mean a child's development or wellbeing will be harmed, but it can impact on a child in a number of ways including: ► Maternal substance abuse may impair an unborn child's development ► Misuse of drugs or alcohol may put a child at risk of physical injury, distress or neglect ► Children may be at risk of physical harm by inadvertently taking drugs or picking up needles not kept safely out of reach.

### **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>98</sup> should be considered. Like other forms of abuse and exploitation, county lines 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.

## **Possible signs of abuse:**

### **Physical Abuse**

- Black eyes without bruising to the forehead
- Finger tip bruising and bruises in various stages of healing
- Cigarette type burns anywhere, patterned burns (irons), rope burns. Contact burns in abnormal sites.
- Lacerations to the body or mouth
- Multiple fractures. Evidence of old fractures.
- Fading injuries noticeable after an absence from school
- Seems frightened of parents, does not want to return home at the end of the day
- Shrinks markedly (backs away) at the approach of adults
- Suffers from frozen watchfulness
- Constantly asks in words/actions what will happen next

**Sexual Abuse** (including assaults between young people), CSE (Child Sexual Exploitation) and FGM (Female Genital Mutilation)

- Difficulty walking or sitting
- Pain/itching/bleeding/bruising/discharge to the genital area/anus
- Urinary infections/sexually transmitted diseases
- Persistent sore throats
- Eating disorders
- Self-mutilation
- Refuses to change for gym or participate in physical activities
- Exhibits an inappropriate sexual knowledge for their age
- Exhibits sexualised behaviour in their play or with other children
- Lack of peer relationships, sleep disturbances, acute anxiety/fear
- School refusal, running away from home
- Pupil may refer to, or talk about, a 'special ceremony'

A girl or woman who's had FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from school
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear.

### **Emotional Abuse**

- Excessive behaviour, such as extreme aggression, passivity or become overly demanding
- Children who self-harm, for instance by scratching or cutting themselves
- Is either inappropriately adult or infantile
- Children who persistently run away from home
- Children who show high levels of anxiety, unhappiness or withdrawal

## **Neglect**

- Frequent absenteeism from school
- Begs or steals money or food
- Lacks needed medical or dental care, immunizations or glasses
- Lacks appropriate clothing, e.g. for weather conditions, shoes are too small, ill-fitted clothes
- Clothes are consistently dirty
- Teeth are dirty, hair quality is poor and contains infestations
- Hands are cold, red and swollen
- The parent or adult caregiver has failed to protect a child from physical harm or danger

## **The Parent or Other Adult Caregiver:**

- Denies existence of, or blames the child, for the child's problems at home or at School
- Sees and describes the child as entirely worthless, burdensome or in another negative light
- Unrealistic expectations of the child i.e. demands a level of academic or physical performance of which they are not capable of achieving.
- Offers conflicting or unconvincing explanation of any injuries to the child
- Appears indifferent to or overtly rejects the child
- Refuses offers of help for the child's problems
- Isolated physically/emotionally

## **Running away or going missing**

- Refer to the AWP (Absent Without Permission) policy B52

Please note that these are not exhaustive examples of the signs of abuse – further details can be found in the handbook at [www.gscb.org.uk/handbook](http://www.gscb.org.uk/handbook)

## **Radicalisation**

The Prevent Duty in Schools came into force on 1/7/2015 and includes guidance on Radicalisation. There is also a duty on schools to prevent and tackle Honour Based Violence (HBV), Forced Marriage (FM) and Female Genital Mutilation (FGM). For more details, either speak to the DSL or visit the website at [www.gsce.org.uk/handbook](http://www.gsce.org.uk/handbook)

## **Information for staff**

- There is no single way to identify if a young person is at risk
- Small changes in behaviour might indicate that there are concerns about their wellbeing
- Even young children might show signs of radicalisation
- Look for breaks away from family or local community (See Appendix 4)
- Using extremist narrative

Support and documentation: CTSA 2015 (Counter-Terrorism and Security Act), Prevent duty, 'Protecting Children at Risk of Radicalisation', The CHANNEL Programme (Support if concerned that a student may be vulnerable to radicalisation).

**IT policies:** The School must make sure that the children are safe from terrorist and extremist material when accessing the internet in school. Suitable filtering must be in place.

## **Other areas of concern for staff to be aware of:**

**Sexting:** Sexting is sending and receiving [sexually explicit](#) messages, primarily between mobile phones, often with images. If a person sends an explicit image of themselves to a partner, then it can be against the law to re-transmit a copy of that image to another person without the consent of the originator. Students will be made aware of the risks via their PSHE lessons and e-safety lectures. Sextortion is a concerning development of Sexting when the images are used against the originator in the form of blackmail.

**Faith Abuse:** Child abuse is never acceptable in any community, in any culture, in any religion, under any circumstances. This includes abuse that might arise through a belief in spirit possession or other spiritual or religious beliefs. If staff have any concerns about a student they must report these to the DSL.

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Students will be made aware of the facts via their PSHE lessons.

**Honour-based violence or abuse:** So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV

### **Safeguarding pupils who are vulnerable to extremism (See Appendix 4)**

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The School values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. The School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

The School seeks to protect children and young people against the messages of all violent extremism.

### **Response to concerns about radicalisation (See Appendix 5)**

1. Our School, like all others, is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL. The SPOC for the School is John Lewis (Senior Deputy Principal).
2. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC/DSL.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

### **Safeguarding pupils who are vulnerable to exploitation, forced marriage or trafficking**

The School's values, ethos and Behaviour, Rewards and Sanctions policy provide the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other.

Our School keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.

Our staff are supported to recognise warning signs and symptoms in relation to specific issues and to include such issues in an age appropriate way in their curriculum if deemed appropriate.

Our staff can access support if they need to talk to families about sensitive concerns in relation to their children.

The DSL knows where to seek and get advice as necessary.

The School brings in experts as required, and would use specialist material to support the work in this area.

### **Children missing from education**

All staff must be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff must be aware of the School's unauthorised absence and Children Missing from Education Policy.

### **Recruitment of Staff**

- The School operates 'Safer Recruitment Procedures', which include Disclosure and Barring Service (DBS) clearance for all appointments. (Please see the Safer Recruitment Policy). It also fulfils other checks as required by the Independent School Standards Regulations.
- The School will not knowingly employ a person who is disqualified under the Regulations in connection with relevant childcare.

- The School ensures that assurance is obtained or that evidence exists, that appropriate safeguarding checks and procedures apply to any staff employed by another organisation, who are working with the school's pupils on another site (for example, in a separate institution). DBS documentation checks must be assured by the service provider and checked by the School in the case of frequent use.
- Recruitment of candidates from overseas including countries in the European Economic Area (EEA) who will be carrying out 'teaching work' must include checking for sanctions or restrictions imposed by another EEA professional regulating authority for teachers.

### **Dismissal of Staff**

- The School reports to the DBS, within two weeks of leaving the School any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children (see Appendix 1).
- The School is under a duty to consider making a referral to the Teaching Regulation Agency [TRA] (formerly National College for Teaching and Leadership) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance is published in *Teacher misconduct: the prohibition of teachers (October 2015)*. *Advice* about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in *'Teacher misconduct: regulating the teaching profession (October 2018)'* The school will as soon as possible report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to TRA referral.

### **Agency and third-party staff (supply staff)**

- The school must obtain written notification from any agency, or third party organisation they use that the organisation has carried out the checks (in respect of the enhanced DBS certificate, written notification that confirms the certificate has been obtained by either the employment business or another such business), on an individual who will be working at the school or college that the school or college would otherwise perform
- Where the position requires a barred list check, this must be obtained by the agency or third party prior to appointing the individual. The school must also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Trainee/student teachers**

- Where applicants for initial teacher training are salaried by the school, the school must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) must be obtained.
- Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools should obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children. There is no requirement for the school to record details of fee-funded trainees on the single central record.

## Visitors

- All visitors to School must be signed in and must wear a visitors badge attached to a school lanyard. The colour of the lanyard is changed every term in accordance with the advice given in the 'Threat of Attack' document produced in October 2014 in consultation with Mr Andy Miller MSC MSyl. Visitors are signed into the Reception.
- The School, where appropriate, may insist that employees of other organisations visiting or working on the School site have had a DBS check.
- Any visitors will be Risk Assessed regarding potential radicalisation before they are allowed to lecture/work with the students. This will be the responsibility of the member of staff who has booked/invited the visitor. (The RA procedure can be obtained from the DSL).
- Any workmen/women who are on site during the school day in term time must be accompanied by a member of staff at all times.
- The Estates Manager ensures that regular contractor staff know the identity of the DSL and that they have the duty to pass on any safeguarding concerns (through the Estates Manager) and adhere to appropriate behavioural boundaries.

## Parents and Guardians

- If the School arranges hosted accommodation for children, then the School must request an enhanced DBS check (with barring information) for the host.

## Training

- All staff must read KCSIE Part One and Annex A and sign to say they understand this information; this is carried out on an annual basis.
- The Designated Safeguarding Lead (DSL) undergoes training in safeguarding, child protection and inter-agency working. This is updated every two years.
- DSL training covers inter-agency working, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children as set out in Annex B of KCSIE
- The DSL must have suitable Prevent awareness training.
- All staff must complete the on-line Prevent training and return a certificate of completion to the DSL
- The Deputy DSL must be trained to the same level as the DSL; therefore every two years
- In line with Part 5 of KCSIE (dedicated to peer-on-peer abuse) all staff must be trained to manage a report of peer-on-peer sexual violence and sexual harassment.
- The Principal and all other staff undergo training in safeguarding every three years. Temporary and voluntary staff who work with children are made aware of the arrangements via an induction session with the DSL.
- Part-time staff are included in whole school training where possible. Where that is not possible, the DSL trains them separately. This also applies to PGCE students.
- New staff and volunteers have an induction programme which includes Safeguarding delivered by the DSL.
- Staff receive other relevant training in matters such as self-harm, dealing with intruder alerts, drugs awareness, e-safety and spotting signs of radicalization, peer on peer abuse and FGM.
- All staff must read and understand (and sign for confirmation) at least part 1 of the KCSIE and Annex A which is available on the Dashboard.
- All above training is supplemented with informal updates eg: by email, e-bulletins and staff meetings, as required but at least annually.

- Students are taught how to stay safe adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet through the PSHE programme, Lectures, Assemblies, and IT lessons and digital workshops.

Any necessary training is carried out as soon as possible.

### **Opportunities to teach safeguarding:**

We must ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum.

Relationships and Sex Education and Health Education is compulsory from September 2020. The statutory guidance can be found here: Statutory guidance: relationships education relationships and sex education (RSE) and health education.

The following resources may help: • DfE advice for schools: teaching online safety in schools • UK Council for Internet Safety (UKCIS)27 guidance: Education for a connected world • National Crime Agency's CEOP education programme: Thinkuknow • Public Health England: Rise Above

Staff should make use of modules from <https://nationalonlinesafety.com/>. All staff are frequently signposted to particular modules on this resource, and the eSafety coordinator maintains a record of its use.

### **Review of Policy and Procedures**

The Safeguarding Policy and procedures is reviewed annually by the Board of Trustees, or as required. Any action required from this review is implemented immediately. A designated Trustee reviews annually the procedures and the efficiency with which related duties have been discharged. This is carried out through the Health & Safety Committee

The Trustees recognise the expertise staff acquire by undertaking safeguarding training and managing concerns on a daily basis. Opportunity is provided via the DSL for staff to contribute to and shape safeguarding arrangements and Safeguarding policy.

Any deficiencies or weaknesses in safeguarding arrangements are remedied without delay, whenever they might be discovered.

### **Links to other policies:**

Safer Recruitment	Absent Without Permission
E-safety	Registration
Personal and Professional Code of Conduct	Off Site Visits
Whistleblowing Policy	Behaviour, Rewards and Sanctions
Child Missing Education	



## **Appendix 1:**

*Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the School may be removed from the DfE register of independent schools.*

Detailed guidance on when to refer to the DBS, and what information must be provided, can be found on GOV.UK.

## **Appendix 2:**

*If an allegation is made against a teacher the quick resolution of that allegation should be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated.*

*All schools should have procedures for dealing with allegations. The procedures should make it clear that all allegations should be reported straight away, normally to the head teacher, principal or proprietor. The procedures should also identify the person, often the chair of Trustees to whom reports should be made in the absence of the head teacher or principal, or in cases where the head teacher or principal themselves are the subject of the allegation or concern. Procedures should also include contact details for the local authority designated officer (LADO) responsible for providing advice and monitoring cases. Where the head is also the proprietor, the policy should include the procedure for contacting the LADO in order that the individual receiving any concern about the head can make a referral directly.*

*In response to an allegation staff suspension should not be the default option. An individual should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification should be recorded by the School and the individual notified of the reasons. Allegations that are found to have been malicious should be removed from personnel records and any that are not substantiated, are unfounded or malicious should not be referred to in employer references.*

*Pupils that are found to have made malicious allegations are likely to have breached school behaviour policies. The school should therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).*



**PERSONAL AND PROFESSIONAL CODE OF CONDUCT  
FOR MEMBERS OF STAFF  
(THIS POLICY APPLIES ACROSS THE TRUST)**

**Updated September 2021**

At St Edward's all staff (teaching and non-teaching) are expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct. The list is not exhaustive, and staff are expected to exercise their professional judgement and common sense.

Staff must have proper and professional regard for the religious ethos, policies and practices of the School. All members of staff must uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside School, particularly by adhering to the following:

1. Treating pupils & students, colleagues and parents with dignity, building relationships rooted in mutual respect and, at all time, observing proper boundaries appropriate to a member of staff's professional position;
2. Having regard for the need to safeguard pupils & students' well-being, in accordance with statutory provisions including KCSIE September 2021 Part one (available on the School Dashboard/Sharepoint/Website);
3. Showing tolerance of and respect for the rights of others; including modelling good behaviour for students, for instance challenging misogynistic and other discriminatory comments and behaviour.
4. Actively promoting fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs;
5. Ensuring that personal beliefs are not expressed in ways which exploit pupils & students' vulnerability or might lead them to break the law;
6. Ensuring that they never actively encourage pupils & students to support particular political viewpoints, and that any teaching of political issues through the curriculum provides pupils & students with a balanced presentation of opposing views;
7. Ensuring that they never encourage or justify terrorism and radicalisation;
8. Members of staff should be aware that it is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if, in the case of those over 16, the relationship is consensual;
9. Members of staff must never enter into a sexual relationship with an ex-pupil of the School under the age of 21 years;
10. It is important that staff do not leave themselves at risk of harm or of allegations of harm to a pupil. Whilst recognising that St. Edward's School provides a wide range of activities at various times of the day, and in various venues, staff must be mindful of managing that risk. Examples of situations where this may be more relevant might include;
  - a. One-to-one tuition
  - b. Sports coaching
  - c. Conveying pupils & students by car
  - d. Electronic communication, e.g. texts and email

Examples of actions that staff must take to minimize such risk might include;

- e. Informing colleagues of their whereabouts and situation
- f. Minimising time spent one-to-one with a student
- g. Asking colleagues to 'check in' on them occasionally
- h. Keeping doors open
- i. Checking that emails/texts cannot be misconstrued

11. Staff must only use school email accounts when communicating with pupils & students or parents about school matters. The pupil's school email account must always be used;
12. Staff must only text pupils from a school mobile phone;
13. Staff must not have pupils as friends on Social Media and any electronic communication must be in accordance with the School E-Safety Policy and Acceptable Use Policy;
14. Photographs of pupils & students should only be taken when they are involved in school activities and only using a school camera or school electronic device and **never** on a private camera/device;
15. There **should** be no physical contact between a member of staff and a pupil unless it forms part of the teaching or coaching and agreed by the pupil in advance;
16. Any meeting between a member of staff and a pupil outside of School should be scheduled and documented with parental notification. Home visits (if absolutely necessary) should only be conducted with full approval of SMT and parents and the parent must be present for the duration of the meeting;
17. A member of staff **should** never restrain a pupil unless they are in danger of harming themselves or others;
18. Members of staff must maintain high standards in their own attendance and punctuality;
19. All staff are expected to be dressed in a professional/business-like manner as befits the School ethos and environment and appropriate to their role; teaching staff should only wear sports kit if they are leading or teaching sports.
20. Staff **should** not convey a single pupil by car (2 or more may be allowed with approval from the DSL)
21. Should a member of staff receive a gift or offer of hospitality whether accepted or not of value in excess of £25 it must be recorded in the gifts/hospitality book in the School Office;
22. Personal gifts to pupils & students should never be made;
23. Staff have a duty to raise any concerns regarding the conduct of other members of staff in accordance with the Whistleblowing Policy;
24. Staff must be aware of and adhere to GDPR rules;
25. Teachers must have an understanding of, and always act within, the statutory frameworks, which set out their professional duties and responsibilities.

I have read and understood the above **PERSONAL AND PROFESSIONAL CODE OF CONDUCT FOR MEMBERS OF STAFF**

**Name:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

## Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:  
*Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.*
3. Extremism is defined by the Crown Prosecution Service as:  
*The demonstration of unacceptable behaviour by using any means or medium to express views which:*
  - *Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;*
  - *Seek to provoke others to terrorist acts;*
  - *Encourage other serious criminal activity or seek to provoke others to serious criminal acts;*  
*or*
  - *Foster hatred which might lead to inter-community violence in the UK.*
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
  - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
  - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
  - Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
  - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
  - Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:
  - Being in contact with extremist recruiters;

- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

## **Appendix 5:**

### **Preventing Violent Extremism**

#### **Roles and responsibilities of the Single Point of Contact (SPOC)**

The SPOC for the School is John Lewis (Senior Deputy Head) who is responsible for:

- Ensuring that staff of the school are aware that you are the SPOC in relation to protecting students/pupils from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students/pupils from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of the School in relation to protecting students/pupils from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the school's RE curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the school about the safeguarding processes relating to protecting students/pupils from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the school for case discussions relating to students / pupils who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information in relation to referrals of vulnerable students / pupils;
- attending meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions;
- Sharing any relevant additional information in a timely manner.