



# MALVERN COLLEGE

## Safeguarding Children (including Child Protection) Policy

### Contents

Section 1)	Introduction
Section 2)	Procedures
Section 3)	Training
Section 4)	Responsibilities
Section 5)	Procedures for Managing Concerns
Section 6)	Specific Safeguarding Issues
Section 7)	Racist Incidents
Section 8)	Anti-bullying
Section 9)	E-Safety
Section 10)	Supporting Children
Section 11)	Looked after children and previously looked after children
Section 12)	Information Sharing & Confidentiality
Section 13)	Communication with Parents
Section 14)	Record Keeping
Section 15)	Supporting and Supervision of Staff
Section 16)	Safer Recruitment and Selection of Staff
Section 17)	Allegations against staff
Section 18)	Whistleblowing
Section 19)	Complaints or Concerns expressed by Pupils, Parents, Staff or Volunteers
Section 20)	Positive Physical Intervention/Use of Reasonable Force
Section 21)	Abuse of Position of Trust
Section 22)	Photography and use of images (including hand-held devices)
Section 23)	Staff/Pupil Relationships
Section 24)	Health & Safety
Section 25)	Safe Environment
Section 26)	Private Fostering Arrangements
Section 27)	Challenge and Escalation
Section 28)	Monitoring and Evaluation
Section 29)	Other Relevant Policies



## Safeguarding Children (including Child Protection) Policy

### Appendix Information

Appendix 1)	Form 1 - Logging a concern about a child's safety and welfare
Appendix 2)	Responsibilities of the Designated Safeguarding Lead
Appendix 3)	Recognition & Identification of Abuse
Appendix 4)	Child Sexual Exploitation (CSE)
Appendix 5)	Effects of domestic abuse on children and young people
Appendix 6)	Forced Marriage – a form of Domestic Abuse
Appendix 7)	Female Genital Mutilation (FGM) – a form of Human Rights Abuse
Appendix 8)	Sexting
Appendix 9)	Radicalisation & Extremism
Appendix 10)	Criminal Exploitation – County Lines
Appendix 11)	Safeguarding Contact Information



## **Safeguarding Children (including Child Protection) Policy**

Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of physical, emotional, sexual abuse, ill-treatment or neglect.

There are a wide range of adults to whom pupils can turn for help. These include Housems, Teaching staff, House staff, the Chaplain, the College Medical staff, the Designated Safeguarding Lead, the Deputy Designated Safeguarding Lead, the Senior Deputy Head, the Deputy Head: Pastoral, College Counsellors and the College's Independent Listeners.

The College aims to raise pupils' awareness of Safeguarding issues through induction processes, the Curriculum and Life Skills lessons as well as through the tutorial system and within the Houses. Pastoral care and College Policies ensure that pupils have a range of contacts and strategies for their own protection and an understanding of the importance of protecting others.

In performing its safeguarding duties and when responding to safeguarding situations, the College will consider at all times what is in the best interests of the child.

This policy is updated annually.

### **College Details:**

- Designated Safeguarding Lead: Mrs Penny Bijl
- Deputy Designated Safeguarding Lead: Mrs Vanessa Young and Mr Lewis Faulkner.
- E-Safety Co-ordinator: Mrs Vanessa Young
- Prevent Lead: Mrs Penny Bijl
- CSE Lead: Mrs Penny Bijl
- Safeguarding Governors: Prof Ken Davey, Mrs Fiona Bridge, Mrs Sue Raby-Smith

Pre-KCSiE 2018 Policy ratified by Governing Body in May 2019.

Amendments in response to KCSiE 2019 to be ratified in December 2019.

## 1. Introduction

- 1.1. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002; and in line with government publications the Teachers' Standards 2012, 'Working Together to Safeguard Children' 2018 and 'Keeping Children Safe in Education' September 2019 and with regard to 'What to do if your worried a child is being abused' (March 2015) and the 'Prevent Duty Guidance: For England and Wales' (July 2015).
- 1.2. Malvern College (the College) fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children.
- 1.3. Our policy applies to all full-time and part-time teaching and support staff, governors, temporary staff and volunteers working in the College. (Please note that separate Safeguarding Policies operate at The Downs Malvern, Abberley Hall and Malvern College International Schools).
- 1.4. The policy applies wherever staff or volunteers are working with pupils even where this is away from the College, for example at an activity centre or on an educational visit.
- 1.5. There are five main elements to our policy:
  - Ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with children;
  - Raising awareness of child protection issues and equipping children with the skills needed to keep them safe;
  - Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
  - Supporting pupils who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan;
  - Establishing a safe environment in which children can learn and develop.
- 1.6. Malvern College safeguarding procedures apply to all pupils, including pupils aged 18 and over. Our policy is to take all reasonable measures to improve the well-being of each child and young person (pupil) in our care. We will carry out our safeguarding and child protection responsibilities in accordance with local inter-agency procedures and the Worcestershire Safeguarding Children Partnership (WSCP) Levels of Need Guidance.

1.7. We recognise that because of the day to day contact with children, College staff are well placed to identify concerns early and to observe the outward signs of abuse.

The College will therefore:

- Establish and maintain an environment where children feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to and their points of view valued;
- Ensure children know that there are adults in the College whom they can approach if they are worried;
- Have regard to the DfE statutory guidance “Relationships Education, Relationships and Sex Education (RSE) and Health Education” (June 2019) by including opportunities in the curriculum, specifically through PSHE/Life Skills and ICT, for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

1.8 We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm. To this end we will:

- Ensure there are systems in place for children to express their views and give feedback e.g. through College/House councils, Peer Mentors, safety/pastoral questionnaires, participation in anti-bullying and e-safety events;
- Ensure that the child's thoughts/wishes and feelings are sought and recorded on all referrals.

## **2. Procedures**

2.1 We will follow the West Midlands Safeguarding Procedures as required by Worcestershire Safeguarding Children Partnership (WSCP) and take account of guidance issued by the Department for Education (DfE).

2.2 The College will:

- Ensure it has a senior leader nominated as Designated Safeguarding Lead (DSL) who has received appropriate training and support for this role;
- Ensure it has at least one member of staff who will act in the absence of the DSL (deputy DSL);
- Ensure it has a nominated governor or governors responsible for safeguarding children;

- Ensure every member of staff (including temporary and supply staff and volunteers) and the governing body knows the name of the DSL and any deputies and understands their role;
- Ensure that the DSL and/or a deputy DSL is always available to speak to during College hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities;
- Ensure all staff and volunteers are alert to the potential need for early help and aware of those children whose vulnerabilities may indicate a greater need and are aware of the role they may play in supporting other agencies and professionals in an early help assessment;
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, including the specific issues of Peer on Peer abuse, Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Children Missing Education (CME), Radicalisation and Extremism (Prevent), Serious Crime and Sexual Violence and Sexual Harassment, and maintain an attitude of 'it could happen here';
- Ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL, deputy DSL or Headmaster in a timely manner and are aware that they may raise concerns directly with Children's Social Care Services if they believe their concerns have not been listened to or acted upon;
- Ensure that parents have an understanding of the responsibility placed on the College and staff for child protection by publishing its policy on the College website.
- Operate a vetting policy which ensures the suitability of adults working with children on College sites at any time;
- Ensure that community users organising activities for children are aware of, and understand the need for compliance with, the College's child protection guidelines and procedures;
- Ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice;
- Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines;

- Be aware of and follow procedures set out by the DfE and WSCP where an allegation of abuse is made against a member of staff or volunteer, including making a referral to the local authority Designated Officer (LADO);
- Ensure that a referral is made to the DBS and/or Teachers Regulation Agency (TRA) if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criterion is met, or would have been had they not resigned;
- Operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training.

2.3 Our procedures will be regularly reviewed and updated at least annually unless an incident or new legislation or guidance requires the need for an interim review. We recognise the expertise our staff builds by undertaking safeguarding training and managing safeguarding concerns on a daily basis. We therefore invite relevant staff to contribute to and shape this policy and associated safeguarding arrangements.

#### 2.4 Reporting Procedure:

- A member of staff needs only reasonable cause for concern in order to act. One sentence from a child indicating abuse or non-accidental injury provides reasonable grounds and is sufficient need to act. This may also apply if clear information comes from another child or adult.
- The member of staff must report the matter to the DSL (or, in her absence, to the Deputy DSL) as soon as possible, unless it is an allegation against a member of staff or volunteer in which case the procedures set out in section 17 should be followed. The Safeguarding Reporting Form at Appendix 1 of this policy should be used, and can be found on Buzz in Resources/Staff Documents. Hard copies are also available from the General Office. The member of staff may refer a matter to children's social care directly in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.
- If a child is in immediate danger or at risk of harm, the DSL must be informed and a referral made (preferably by the DSL) to Children's Social Care and/or the police immediately or within 24 hours.

### 3. Training

3.1 When staff join Malvern College they will be informed of the safeguarding children arrangements in place. All staff will be given a copy of this policy including its Appendices and Part 1 KCSIE 2019. Annex A contains important additional

information about specific forms of abuse and safeguarding issues. College leaders and those staff who work directly with children should read the annex.

3.2 All staff will receive induction in safeguarding children and will also be supplied with the Safeguarding Policy; the promoting good behaviour and discipline policy; the staff Code of Conduct, the College's policy on Children Missing from Education (CME) and be informed about the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

3.3 The induction programme will include basic child protection information relating to signs and symptoms of abuse, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child and advice on safe working practice.

3.4 All volunteers, temporary staff and regular visitors to our College will be told where our policy is kept, given the name of the DSL and deputy/ies and informed of the College's procedures in reporting concerns.

3.5 All staff will receive training in child protection and safe working practice, updated at least once every three years, in line with the WSCP training guidance. Training will include signs and symptoms of abuse and neglect, as well as specific safeguarding issues, such as CSE, FGM, Prevent, serious crime, on-line safety and peer on peer abuse, including sexting and sexual violence and sexual harassment. Training will also include how to record and report abuse both within College and to Children's Social Care.

3.6 In addition, they will receive safeguarding and child protection refresher training and updates from the DSL as required, but at least annually.

3.7 Staff with specific responsibility for safeguarding children will undertake both single and inter-agency training at a level suitable to their role and responsibilities, updated every two years. In addition to formal training the DSL and deputy/ies will update their knowledge and skills via briefings, WSCP newsletters, network meetings and seminars or conferences, at regular intervals, at least annually.

3.8 Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, FGM, Radicalisation (WRAP training), Sexual Violence and Sexual Harassment, Management of Allegations of Abuse and cascade the learning from this training to the rest of the staff.

3.9 DSL/Deputy DSL Training:

The Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals in order to:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the College's child protection policy and procedures, especially new and part time staff;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- be able to keep detailed, accurate, secure written records of concerns and referrals using CPOMS as appropriate;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the College may put in place to protect them and to meet the requirements and procedures of the Worcestershire Safeguarding Children Board.

The DSL attends Prevent Awareness training as appropriate and will support the College regarding the Prevent Duty requirements, providing advice and support to staff on protecting children from risk of radicalisation.

The College's Lower Sixth Leadership team are provided with safeguarding training during their induction and in addition, the anti-bullying policy and peer on peer abuse policies are discussed with members of the Pupil and Staff Thrive groups demonstrating that pupils and staff are consulted.

#### **4. Responsibilities**

4.1 The College Council will nominate at least one member to take leadership responsibility for safeguarding children and liaise with the DSL and/or Headmaster in matters relating to safeguarding. It will ensure that:

- the DSL takes lead responsibility for safeguarding and child protection and does not delegate this responsibility;
- the DSL and D/DSL role is explicit in the role holders' job descriptions;

- safeguarding policies and procedures are in place, available to parents on the College website or by other means and are reviewed at least annually;
- safeguarding responses are put in place in cases where children go missing from education;
- mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education 2019;
- an annual report on the effectiveness of the College's safeguarding procedures is presented to the governing body and any returns requested by the LA/WSCP (eg section 175/157 audit, CSE audit) are completed in a timely manner;
- any weaknesses brought to its attention relating to safeguarding are remedied without delay;
- it complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism.

#### 4.2 The Headmaster will ensure that:

- The Safeguarding policies and procedures are fully implemented and followed by all staff;
- Sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection;
- All staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures;
- All allegations of abuse are reported to the LADO in a timely manner.

#### 4.3 The DSL will co-ordinate action and risk assessments for safeguarding and promoting the welfare of children within the College setting. The DSL is responsible for:

- Organising child protection induction training for all newly appointed staff and delivering whole staff training with annual updates as required;
- Providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education;

- Undertaking, in conjunction with the Headmaster and Safeguarding Governors, an annual audit of safeguarding procedures.
- Making use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Children's Social Care intervention is met;
- Referring a child to the WSCB Family Front Door when there are concerns about possible abuse and neglect;
- Referring a child to the Channel Panel when there are concerns about possible radicalisation or involvement in extremist groups;
- Taking lead responsibility for making referrals to the police where a pupil may have been involved in an incident involving a crime;
- Liaising with the Headmaster to ensure he/she is informed of all child protection issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- Liaising with other staff (for example Housems., pastoral support staff, medical centre staff or counsellors, the E-safety Co-ordinator, the SENCO and ICT) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Keeping detailed written records (usually on CPOMS) of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately;
- Ensuring all child protection records are kept securely, separate from the main pupil file, and in locked or password protected locations;
- Ensuring that all child protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of county, and that a receipt of transfer is obtained;
- Notifying the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan;
- Monitoring unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in line with 'missing children' procedures;
- Developing effective links with relevant agencies and other professionals and co-operating as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings,

initial and review child protection conferences, core group and child in need review meetings;

- Contributing to assessments and providing a report to initial and review conferences, if requested, which have been shared with parents first, whenever possible;
- Liaising with the Head of Life Skills (Mrs Vanessa Young), who co-ordinates a programme of personal, social, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships and staying safe on-line.
- Liaising with the Deputy Head:Pastoral (Mr Lewis Faulkner) regarding the promotion of fundamental universal (British) values;
- Acting as a source of support, advice and expertise for all staff.

## 5. Procedures for Managing Concerns

5.1 Our College adheres to child protection procedures that have been agreed locally through the Worcestershire Sageguarding Children Partnership (WSCP). Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the West Midlands Safeguarding Children Procedures and the WSCP Levels of Need Guidance.

**Website Link:** <https://westmidlands.procedures.org.uk/>

5.2 Every member of staff, including volunteers working with children at our College, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

5.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns to the DSL, in accordance with this policy, to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

- 5.4 It is not the responsibility of College staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.
- 5.5 The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our College. Any member of staff or visitor to the College who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the Deputy Designated Safeguarding Lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.
- 5.6 All concerns about a child or young person should be reported without delay and recorded in writing using the agreed template (see Appendix 1, available on Buzz, or as hard copies from General Office or in the Mem. Lib.) or through CPOMS, as appropriate.
- 5.7 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.
- 5.8 All referrals will be made in line with local procedures as detailed on the WSCP website. **Website Link:** <https://www.safeguardingworcestershire.org.uk/>
- 5.9 If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Headmaster. Concerns should always lead to help for the child at some point.
- 5.10 Staff should always follow the reporting procedures outlined in this policy in the first instance.
- 5.11 However, they may also share information directly with Children's Services, or the police if:
- the situation is an emergency and the designated senior person, their deputy and the Headmaster are all unavailable;
  - they are convinced that a direct report is the only way to ensure the pupil's safety.
- 5.12 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this

policy should raise their concerns with the Headmaster or the Chair of College Council. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

## 6 Specific Safeguarding Issues

### 6.1 Peer on peer abuse (including Sexual Violence and Sexual Harassment)

Malvern College has a separate, detailed Peer on Peer Abuse policy, which can be found on our website.

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings.

Malvern College recognises that abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

Malvern College also recognises 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. The different forms peer on peer abuse can take include but are not limited to:

- sexual violence (such as rape, assault by penetration and sexual assault);
- sexual harassment (such as sexual comments, remarks or jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse);
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. This is now a criminal offence;
- bullying (including cyber bullying) gender-based violence/sexual assaults and sexting:  
**Website Link:** <https://www.gov.uk/government/publications/sexting-in-schools-and-colleges>
- initiation/hazing type violence and rituals.

Staff must never tolerate or dismiss concerns relating to peer on peer abuse.

All staff are made aware of the College policy and processes in dealing with instances of peer on peer abuse (See Appendix 3, the Antibullying Policy and the Peer on Peer Abuse Policy).

We will ensure, through training, that staff, volunteers and governors will have an understanding of the range of peer on peer abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and manage such issues.

Staff will be given the skills to identify and manage harmful sexual behaviour using resources such as the Brook Traffic Light Tool. Staff should be aware that some groups are potentially more at risk, for example girls, children with SEND and LGBT children.

Staff should be aware that such incidents and/or behaviours can be associated with factors outside the College and can occur between children outside the College. Staff, and particularly the DSL, should always consider the context in which such incidents and/or behaviours occur. This is known as ‘contextual safeguarding’.

Where the abuse is physical, verbal, bullying or cyber-bullying, recording of such incidents and sanctions will be applied in line with our Promoting Good Behaviour and Discipline Policy and Anti-Bullying policy. Where a child discloses safeguarding allegations of a sexual nature against another pupil in the same setting, the DSL should refer to the West Midlands Safeguarding Children procedures website and seek advice from the Family Front Door or Community Social Worker before commencing its own investigation or contacting parents. This may mean, on occasions, that the College is unable to conduct its own investigation into such incidents. All such incidents will be recorded using our child protection/safeguarding recording system (CPOMS).

Reports of incidents of sexual violence or sexual harassment will be responded to in line with Part 5 of Keeping Children Safe in Education 2019 and the DfE guidance:

**Website Link:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

Support for the victims of abuse will be in line with support outlined in the College’s Behaviour and Anti-Bullying policies. For victims of sexual abuse, the College should follow advice given by Children’s Social Care and consider using external agencies, such as Early Help or West Mercia Rape and Sexual Abuse Support Centre to support any strategies that they may be able to provide within College.

Depending on the nature of abuse, the College may need to consider providing measures to protect and support the victim, the alleged perpetrator and other pupils

and/or staff in the College by means of a risk assessment. The risk assessment should be recorded and kept under review.

## 6.2 Special Educational Needs and Disability (SEND)

The College recognises that children with special educational needs (SEN) and disabilities can face additional safeguarding risks and challenges. Specific challenges exist in recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children 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 will always consider extra pastoral support for children with SEND to address these additional challenges.

## 6.3 Child Sexual Exploitation (CSE) (See Appendix 4)

We recognise that CSE is a form of child abuse involving criminal behaviours against children and young people which can have a long-lasting adverse impact on a child's physical and emotional health. Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to child trafficking.

The College addresses the risks of sexual exploitation in the Life Skills and RSE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff, volunteers and governors are made aware of the indicators of sexual exploitation, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual and that it does not always involve physical

contact but can occur through the use of technology. All concerns of CSE are reported immediately to the DSL.

#### 6.4 'Honour Based' Violence and Female Genital Mutilation (FGM) – (See Appendix 7)

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV) and we provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBV they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Where FGM has taken place, there has been a mandatory reporting duty placed on teachers (persons employed or engaged to carry out teaching work) since October 2015. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance: 'Mandatory Reporting of Female Genital Mutilation – Procedural Information' (October 2015)

**Website Link:** <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

#### 6.5 Radicalisation and Extremism - (See Appendix 9)

We recognise that children are vulnerable to extremist ideology and radicalisation. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. We will ensure that:

- Through training, staff, volunteers and governors have an understanding of what radicalisation and extremism is, why we need to be vigilant in College and how to respond when concerns arise.
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our College by using effective filtering and usage policies. The College has in place appropriate ICT filters and monitoring systems to enable us to identify and, where appropriate, limit children's exposure to online extremist material. However, we aim to ensure that "overblocking" does not lead to unreasonable restrictions that could compromise learning.

- The DSL has received Prevent training and will act as the point of contact within the College for any concerns relating to radicalisation and extremism.
- Where a pupil is suspected to be at risk of radicalisation, the DSL will consider the level of risk and refer, if appropriate, to the Channel Panel and/or to children’s social care. Staff can also contact the police directly on 101 if they have concerns.
- The DSL will make referrals in accordance with West Midlands child protection procedures and will represent the College at Channel meetings as required.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils. We encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs (see our Promoting Universal Values policy on the College website).
- With regard to ‘The Use of Social Media For Online Radicalisation (July 2015) College staff are also aware of and vigilant regarding the role of social media in encouraging travel to Iraq and Syria and promoting radicalisation.  
**Website Link:** <https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>
- Where a pupil is suspected to be at risk of radicalisation, the DSL will consider the level of risk and refer, if appropriate, to the Police or to children’s social care. Staff can also contact the police directly on 101 if they have concerns.
- We will use relevant information, tools and resources to help our staff and parents recognise and address extremism and radicalisation in young people, for example the Educate Against Hate website.  
**Website Link:** <https://educateagainsthate.com/>

#### 6.6 Domestic Abuse – (see Appendix 5)

- We recognise that 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. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life.
- We will ensure that our pupils are educated to ensure they understand what a healthy relationship looks like, for example by using the “WSCB Healthy Relationships – a whole school approach” and resources from the WCC Domestic Abuse and Sexual Violence website.  
**Website Link:** <http://www.worcestershire.gov.uk/domesticabuse>

## 6.7. Children Missing Education (CME)

We recognise that a child going missing from education is a potential indicator of abuse or neglect.

- Our procedures for dealing with children that go missing from education are based on the Local Authority and West Midlands Safeguarding Children procedures. Staff are made aware of these procedures at induction and through our Supervision Policy and Missing Pupil Policy. We will make every attempt to obtain two emergency contact numbers for each child registered at the College to ensure we are able to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.
- We will ensure that we inform the local authority when removing a child from the College role at standard and non-standard transition points in line with the DfE Children Missing Education  
**Website Link:** <https://www.gov.uk/government/publications/children-missing-education>
- We will ensure that we follow these procedures for dealing with children that 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 their going missing in future.
- We will ensure that we report children missing education to the LA CME officer, in line with statutory requirements.

## 6.8. Serious Violence, including Child Criminal Exploitation - County Lines - appendix 10.

This is where children and young people are being exploited and drawn into drug related activity by criminal gangs, groups or individuals. Typically, the gang exploits young or vulnerable people to store and/or supply drugs, move cash and to secure the use of homes belonging to vulnerable adults. There is a cross over between CSE and County Lines and young people are sometimes required to offer sex in order to pay off perceived debts. Concerns about young people being possibly involved should be passed to the DSL who will refer to Police and the Family Front Door.

## 6.9. Modern Slavery

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including Colleges, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public

authority (including Colleges) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL will then contact the NCA.

## **7. Racist Incidents**

Our policy on racist incidents is set out within the Anti-Bullying Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We maintain a log of racist incidents in College through the CPOMS recording system.

## **8. Anti-Bullying**

8.1 Our policy on anti-bullying is set out in a separate policy and we acknowledge that to allow or condone bullying may lead to consideration under child protection procedures. All incidences of bullying, including cyber-bullying, sexting, racist, homophobic and gender-related bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in College.

8.2 We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Family Front Door/Children's Social Care or to the Police.

## **9 E-safety (Online Safety)**

9.1 The DSL understands the unique risks associated with online safety and, working closely with the E-Safety Coordinator (Mrs Vanessa Young who, as the Deputy DSL, is also DSL trained) has the relevant knowledge and up to date capability required to keep children safe whilst they are online at College.

9.2 The DSL is able to recognise the additional risks that children with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and has the capability to support SEND children to stay safe online.

9.3 All members of staff are trained in and receive regular updates in e-safety and recognising and reporting concerns.

- 9.4 Our Policy on the Acceptable Use of ICT and E-Safety is available on the College website and recognises that internet safety is a whole College responsibility (staff, pupils, governors and parents).
- 9.5 Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal.
- 9.6 We therefore recognise our responsibility to educate our pupils, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.
- 9.7 We will ensure that filters are in place to prevent access to unsuitable sites and we will monitor the use of the College network and internet to ensure that any pupil or staff member attempting to access inappropriate, abusive or harmful material is appropriately advised and/or supported.

## 10. Supporting Children

- 10.1 We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame.
- 10.2 We acknowledge that College may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm.
- 10.3 We are aware that research shows that at school their behaviour may be challenging and defiant or they may be withdrawn.

### **The College will endeavour to support all children by:**

- Encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, and challenging bullying and humiliating behaviour;
- Promoting a positive, supportive and secure environment, giving pupils a sense of being valued;
- Enforcing a consistently applied College behaviour policy (known as the Promoting Good Behaviour and Discipline Policy) which is aimed at supporting vulnerable pupils. The College will ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred;

- Liaising with other agencies that support the pupil such as Children's Social Care Services, Child and Adult Mental Health Service (CAMHS) and those agencies involved in the safeguarding of children;
- The use of Early Help Services, when appropriate;
- Notifying Children's Social Care Services immediately there is a significant concern;
- Providing continuing support to a child about whom there have been concerns who leaves the College by ensuring that appropriate information is forwarded under confidential cover to the child's new setting.

## **11. Looked after children and previously looked after children**

The most common reason for children becoming looked after is as a result of abuse or neglect. The College will ensure that staff have the necessary skills, knowledge and understanding to keep looked after children safe. Appropriate staff will, where relevant, have information about a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They will also have information about the child's care arrangements, if relevant, including the level of authority delegated to the carer by the authority looking after the child. If the College is supporting looked after children on roll, a designated teacher for looked after children and the DSL will have details of the child's social worker and the name and contact details of the Local Authority's Virtual Head for children in care and previously looked after children.

## **12 Information Sharing & Confidentiality**

We recognise that all matters relating to child protection are confidential. Information sharing is vital in identifying and tackling all forms of abuse.

12.1 All personal information will be processed fairly and lawfully in line with our duties under the Data Protection Act 2018, and including GDPR, and will be held safely and securely. However, we recognise that this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.

12.2 The Headmaster or DSL will disclose any information about a pupil to other members of staff on a need to know basis only.

12.3 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

12.4 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being, or that of others.

12.5 When a child about whom concerns have been raised and recorded leaves the College, the DSL will consider if it would be appropriate to share information with the new College in advance of the child leaving to ensure that support is in place for when the child arrives

### **13 Communication with Parents**

13.1 We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.

13.2 We will always undertake appropriate discussion with parents prior to involvement of another agency unless to do so could place the child or an adult at further risk of harm or would impede a criminal investigation.

13.3 We will ensure that parents have an understanding of the responsibilities placed on the College and staff to safeguard children and their duty to co-operate with other agencies in this respect.

### **14. Record Keeping**

14.1 Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible), writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated and signed, with name printed alongside the signature. Concerns will be recorded using the College's Safeguarding Children recording system (CPOMS).

14.2 All records of a child protection nature will be passed to the DSL including case conference minutes and written records of any concerns. Child protection records are kept securely under lock and key or password protected, with only appropriate persons having access to them.

14.3 Any referrals made to other agencies will be copied prior to sending and stored in the child's child protection file.

14.4 The DSL will maintain and regularly audit the College's child protection records and ensure that each stand-alone Child Protection file includes a chronology of significant events, and that information and contact details are accurate and up to date.

14.5 The DSL will transfer the child protection record in a safe and timely manner when a child moves College, ensuring receipt of transfer is obtained.

14.6 The DSL may copy child protection records generated by the College prior to transfer and retain for as long as is necessary (normally d.o.b. + 25 years), where there is justification for believing that the records may be required as evidence of the College's involvement with the child for statutory purposes (e.g. court cases or serious case reviews). When the records are no longer required, they will be securely disposed of.

## **15. Supporting and Supervision of Staff**

15.1 We recognise that staff working in the College who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

15.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or regular supervision, as appropriate.

15.3 We will also support such staff by providing structured, regular Supervision, as appropriate.

15.4 We will enable supervision for the DSL through appropriate external professionals in order to support, promote best practice and challenge unsatisfactory practice.

15.5 Staff will be made aware of safer working practice guidance and will be given opportunities to develop their understanding of what constitutes safe and unsafe behaviour.

## **16. Safer Recruitment and Selection of Staff**

16.1 The College has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, recruitment websites, and candidate information packs.

16.2 The recruitment process is robust in seeking to establish the commitment of candidates to support the College's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them. References are requested, scrutinised and discrepancies followed up.

16.3 All staff working within our College who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK check.

- 16.4 All teachers working within our College have been checked using the Teacher Services website to ensure they have been awarded QTS, where appropriate, they have completed their teacher induction, where appropriate, and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions (eg management posts).
- 16.5 Our governors are subject to an enhanced DBS check without barred list check unless they are in Regulated Activity in which case an enhanced DBS check with barred list check will be undertaken.
- 16.6 Any member of staff taking up a management position will be checked to ensure s/he is not subject to a section 128 direction made by the Secretary of State.
- 16.7 The College maintains a single central record of recruitment checks.
- 16.8 Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.
- 16.9 Volunteers who are not working in regulated activity, will be supervised at all times. A risk assessment will be undertaken, if appropriate, to help decide whether or not an enhanced DBS check, without barred list check, is required.
- 16.10 The College seeks written assurance from supply and third-party agencies, alternative providers, initial teacher training providers and contractors that they have undertaken all appropriate checks on any of their staff that work with or have regular contact with our pupils.

## **17. Allegations against staff**

The College has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The College will take action in accordance with Part four of Keeping Children Safe in Education 2019 and the College's employment procedures.

- 17.1 We acknowledge that a pupil may make an allegation against a member of staff or volunteer.
- 17.2 If such an allegation is made, which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the Headmaster, unless the allegation concerns the Headmaster, in which case the Chair of College Council will be informed immediately.

- 17.3 The Headmaster (or Chair of College Council) on all such occasions will discuss the content of the allegation with LADO, prior to undertaking any investigation.
- 17.4 If it is not possible to report to the Headmaster or Chairman of the College Council in the circumstances set out above, a report should be made immediately to the Designated Safeguarding Lead. The Designated Safeguarding Lead will take action in accordance with these procedures and will as soon as possible inform the Headmaster or, where appropriate, the Chairman of the College Council or nominated member of the College Council.
- 17.5 The College will follow the DfE, West Midlands Safeguarding Children and Local Authority procedures for managing allegations against staff, a copy of which is available in College.
- 17.6 The case manager will be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.
- 17.7 The parents of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it.
- 17.8 Where the LADO advises that a strategy discussion is needed, or that the police or children's social care need to be involved, the case manager will not inform the accused or the parents until these agencies have been consulted and it has been agreed what information can be disclosed.
- 17.9 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.
- 17.10 Malicious Allegations:
- Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the College's Promoting Good Behaviour & Discipline Policy.
  - Where a parent has made a deliberately invented or made a malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the College on the basis that they have treated the College or a member of staff unreasonably.
  - Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the College reserves the right to contact the police to determine whether any action might be appropriate.

## 18. Whistleblowing

18.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

18.2 All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the College's Whistleblowing policy.

18.3 Whistleblowing concerns about the Headmaster should be raised with the Chair of College Council.

18.4 Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the NSPCC Whistleblowing Helpline.

**Website Link:** <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

## 19. Complaints or Concerns expressed by Pupils, Parents, Staff or Volunteers

19.1 We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

19.2 We will also seek to ensure that the child or adult who makes a complaint is informed not only about the action the College will take but also the length of time that will be required to resolve the complaint. The College will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint. The College's complaints procedures are readily available.

## 20. Positive Physical Intervention/Use of Reasonable Force

20.1 Our policy on positive handling is set out in our Promoting Good Behaviour and Discipline Policy and our Positive Handling Policy, and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property.

20.2 We understand that physical intervention of a nature that causes injury or distress to a child may be considered under management of allegations or disciplinary procedures.

20.3 Staff who are likely to need to use physical intervention will be appropriately trained.

20.4 All incidences of physical intervention will be recorded on the appropriate form in the Positive Handling Policy, in accordance with recommended procedures.

20.5 We recognise that touch is appropriate in the context of working with children and all staff have been given 'safe working practice' guidance to ensure they are clear about their professional boundaries. "No contact" policies can leave staff unable to fully support and protect pupils.

20.6 We acknowledge that when applying reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.

## **21. Abuse of Position of Trust**

21.1 We recognise that as adults working in the College, we are in a relationship of trust with pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.

21.2 We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust.

21.3 We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age

## **22. Photography and use of images (including hand held devices)**

22.1 The welfare and protection of our children is paramount and consideration should always be given to whether the use of photography will place our children at risk. Images may be used to harm children, for example as a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites.

22.2 For this reason consent is always sought when photographing children using any means and including iPads, smart phones or cameras and additional consideration given to photographing vulnerable children, particularly Looked After Children or those known to be fleeing domestic violence. Consent for potentially vulnerable pupils will be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).

- 22.3 Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

## **23 Staff/pupil relationships**

- 23.1 The College provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

## **24 Health & Safety**

- 24.1 Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the College environment and when away from the College, for example when undertaking College trips and visits.
- 24.2 Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.

## **25 Safe Environment**

- 25.1 The College undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.
- 25.2 The College has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of College hours.
- 25.3 The College keeps a visitors' book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted at all times whilst on College premises by a member of staff or appropriately vetted volunteer. Prospective parents and visitors will also be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the College premises.
- 25.4 Visitors to the College, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.
- 25.5 All visitors to boarding houses must observe the necessity to be kept under sufficient staff supervision during their visit.

## **26 Private fostering arrangements**

- 26.1 A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential College, children's home or hospital are not considered to be privately fostered.
- 26.2 Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.
- 26.3 Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that Colleges are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.
- 26.4 By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible.
- 26.5 If we become aware of a private fostering arrangement, we will check that Children's Services have been informed.

## **27. Challenge and Escalation**

- 27.1 We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children.
- 27.2 As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.
- 27.3 We are aware of the WSCP Escalation Procedures in raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

## **28. Monitoring and Evaluation**

- 28.1 Our Safeguarding Children policy and procedures will be monitored and evaluated by:
- Completion of the annual safeguarding audit/report to the Governing Body;
  - Pupil surveys and questionnaires;
  - Discussions with children and staff;

- Scrutiny of data and risk assessments;
- Scrutiny of the College's single central record of recruitment checks;
- Scrutiny of College Council minutes;
- Monitoring of logs of bullying/racist/behaviour incidents and PPI records;
- Supervision of staff involved in child protection;
- Case file audits undertaken by those College Governors with specific safeguarding responsibility.

The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the College Council as necessary. Any child protection incidents at the College will be followed by a review of these procedures by the DSL and a report to the College Council. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the College's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

In addition, the College Council will ensure that the DSL will undertake an annual review of this policy. The outcome of the annual review by the DSL will be reported to the College Council who will review the policy and the implementation of its procedures, including good cooperation with local agencies, and consider the proposed amendments to the policy, from both the DSL and its own members, before giving the revised policy its final approval. Detailed minutes recording the review by the College Council will be made.

## **29. Other Relevant Policies**

29.1 The Governing Body's statutory responsibility for safeguarding the welfare of children goes beyond basic child protection procedures.

29.2 The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Staff Code of Conduct
- Staff Disciplinary Policy
- Complaints Procedure for Parents
- Parental Concerns Policy
- Promoting Good Behaviour and Discipline Policy
- Peer on Peer Abuse Policy
- Anti-Bullying Policy
- Positive Handling Policy
- SEN and Learning Difficulties Policy
- Educational Visits Policy
- First Aid Policy
- Medical Care Policy
- Health and Safety Policy
- Relationships and Sex Education Policy

- Managing Images Policy
- Social Media Policy
- Policy on the Acceptable Use of ICT and E-Safety
- Equal Opportunities Policy
- Whistleblowing Policy
- Promotion of Universal (British) Values Policy

29.3 The above list is not exhaustive but when undertaking development or planning of any kind the College will need to consider safeguarding matters.

**APPENDIX 1**

**FORM 1 - Logging a Concern about a Child's Safety and Welfare – all staff and visitors**

Pupil's name:		d.o.b.	Year Group:
Date:		Time:	
Name: .....		.....	
Print		Signature	
Position:			
Note the reason(s) for recording the incident.			
Details of concern/incident - record the who/what/where/when factually (continue on reverse of sheet if necessary):			
Any other relevant information (witnesses, immediate action taken)			
Action taken			
Reporting staff signature ..... Date .....			
DSL – Response/Outcome			
DSL signature ..... Date .....			

Check to make sure your report is clear now - and will also be clear to a stranger reading it next year.

**PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD**

Continuation Sheet

Incident /Concern; other relevant information; Action Taken; Outcome

PUPIL NAME:

DATE

DETAILS

Signature



## **Appendix 2**

### **Responsibilities of the Designated Safeguarding Lead**

In accordance with Annex B of Keeping Children Safe in Education, the main responsibilities of the Designated Safeguarding Lead are:

#### **Managing referrals**

- a. To take lead responsibility for referring all cases of suspected abuse of any pupil at the College to children's social care.
- b. To take lead responsibility for referring to the designated officer at the local authority all child protection concerns which involve a member of staff or volunteer.
- c. To take lead responsibility for making referrals to the Disclosure and Barring Service (DBS) where a member of staff is dismissed or resigns in circumstances where there has been actual harm, or risk of harm, to a child.
- d. To take lead responsibility for making referrals to the police where a crime may have been committed.
- e. Liaising with the Headmaster in respect of police investigations or investigations under section 47 of the Children Act 1989 which involve the College.
- f. Liaise with staff on matters of safety and safeguarding, and act as a source of support, advice and expertise.
- g. To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- h. Refer cases to the Channel Programme where there is a radicalisation concern and support staff who make referrals to the Channel programme.
- i. Liaise with designated officers at the local authority for child protection concerns and referral decisions.

## Raising awareness

- a. Ensure this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the College Council regarding this.
- b. Ensure this policy is available publicly, and ensure it is understood and used appropriately.
- c. Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the College's role in this.
- d. Maintain links with the Worcestershire Safeguarding Children Board to ensure staff are aware of training opportunities and the local policies on safeguarding.
- e. Where children leave the College ensure their child protection file is copied for any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained.
- f. Support the school with regards to the requirements of the Prevent duty and provide advice, training and support to staff on protecting children from the risk of radicalisation.

The Deputy Designated Safeguarding Lead will carry out this role where the Designated Safeguarding Lead is unavailable.

The Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead have undertaken child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals in order to:

- a. understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- b. have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- c. ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
- d. be alert to the specific needs of children in need, those with special educational needs and young carers;
- e. be able to keep detailed, accurate, secure written records of concerns and referrals;
- f. obtain access to resources and attend any relevant or refresher training courses;
- g. encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them and to meet the requirements and procedures of the Worcestershire Safeguarding Children Board.

The DSL attends Prevent Awareness training as appropriate, and will support the College regarding the prevent duty requirements, providing advice and support to staff on protecting children from risk of radicalisation.

During term time the DSL or Deputy DSL should be available (during College hours) for staff to discuss safeguarding concerns.

All members of the Safeguarding team also receive higher level safeguarding training.

### **APPENDIX 3**

#### **Recognition & Identification of Abuse**

**Taken from Working Together to Safeguard Children 2018, APPENDIX A.**

#### **What is abuse?**

Abuse and neglect are forms 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 a stranger for example, via the internet. Abuse can take place wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

#### **Indicators of Abuse**

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing the circumstances of any child any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

#### **Emotional Abuse**

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), 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, though it may occur alone.

#### **Emotional abuse is difficult to:**

- define
- identify/recognise
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc.')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Unusual physical behaviour (rocking, hair twisting, self-mutilation) - consider within the context of any form of disability such as autism
- Extremes of passivity or aggression
- Children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present
- Babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding
- Toddler/Pre-School – head banging, rocking, bad temper, 'violent', clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills
- School age – Wetting and soiling, relationship difficulties, poor performance at school, non-attendance, antisocial behaviour. Feels worthless, unloved, inadequate, frightened, isolated, corrupted and terrorised
- Adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive and delinquent behaviour
- Child may be underweight and/or stunted
- Child may fail to achieve milestones, fail to thrive, experience academic failure or under achievement
- Also consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability

## **Neglect**

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), failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision (including the use of inadequate care-givers) or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Neglect can often fit into six forms which are:

- Medical – the withholding of medical care including health and dental.
- Emotional – lack of emotional warmth, touch and nurture
- Nutritional – either through lack of access to a proper diet which can affect in their development.
- Educational – failing to ensure regular school attendance that prevents the child reaching their full potential academically
- Physical – failure to meet the child's physical needs

- Lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger.

### **Common Concerns:**

With regard to the child, some of the regular concerns are:

- The child's development in all areas including educational attainment
- Cleanliness
- Health
- Children left at home alone and accidents related to this
- Taking on unreasonable care for others
- Young carers

Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person. It is important to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability. This can be a consequence of:

- Poor health, including mental health or mental illness
- Disability, including learning difficulties
- Substance misuse and addiction
- Domestic violence

School staff need to consider both acts of commission (where a parent/carer deliberately neglects the child) and acts of omission (where a parent's failure to act is causing the neglect). This is a key consideration with regard to school attendance where parents are not ensuring their child attend school regularly.

Many of the signs of neglect are visible. However school staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a pupil is being neglected. Children spend considerable time in school so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

## Physical signs:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- The child seems underweight and is very small for their age
- The child is poorly clothed, with inadequate protection from the weather
- Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are crucially important
- Signs of malnutrition include wasted muscles and poor condition of skin and hair. It is important not to miss an organic cause of failure to thrive; if this is suspected, further investigations will be required
- Infants and children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment
- Failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any disability
- 

## Behavioural signs:

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- If they are often absent from school for no apparent reason
- If they are regularly left alone, or in charge of younger brothers or sisters
- Lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks
- Craving attention or ambivalent towards adults, or may be very withdrawn
- Delayed development and failing at school (poor stimulation and opportunity to learn)
- Difficult or challenging behaviour

## Physical Abuse

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.

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the police and/or Children's Services in order to safeguard the child.

**Staff must be alert to:**

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries;
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern, child too young for the activity described.

**Physical signs:**

- Bald patches
- Bruises, black eyes and broken
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns
- General appearance and behaviour of the child may include:
  - Concurrent failure to thrive: measure height, weight and, in the younger child, head circumference;
  - Frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.
- Bruising:
  - Bruising patterns can suggest gripping (finger marks), slapping or beating with an object.
  - Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.
- Other injuries:
  - Bite marks may be evident from an impression of teeth
  - Small circular burns on the skin suggest cigarette burns
  - Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
  - Red lines occur with ligature injuries
  - Retinal haemorrhages can occur with head injury and vigorous shaking of the baby
  - Tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate.

- Fractured ribs: rib fractures in a young child are suggestive of non-accidental injury
- Other fractures: spiral fractures of the long bones are suggestive of non-accidental injury

### **Behavioural signs:**

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- Fear of suspected abuser being contacted
- Injuries that the child cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

### **Sexual Abuse**

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 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 (including via the internet). 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.

Sexual abuse is usually perpetrated by people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, people working with the child in school or through other activities.

The sexual abuse of children by other children is a specific safeguarding issue in education.

Characteristics of child sexual abuse:

- It is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites;
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.
- 

In young children behavioural changes may include:

- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Being overly affectionate - desiring high levels of physical contact and signs of affection such as hugs and kisses
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
- They may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age
- Starting to wet again, day or night/nightmares
- 

In older children behavioural changes may include:

- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism
- Genital discharge or urinary tract infections
- Marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically
- The child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
- The child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person

- Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

Physical signs and symptoms for any age child could be:

- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Stomach pains or discomfort walking or sitting
- Sexually transmitted infections
- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
- Soreness, itching or unexplained bleeding from penis, vagina or anus
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls

### **Sexual Abuse by Young People**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person.

It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

### **Assessment**

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent – agreement including all the following:
  - Understanding that is proposed based on age, maturity, development level, functioning and experience
  - Knowledge of society's standards for what is being proposed
  - Awareness of potential consequences and alternatives
  - Assumption that agreements or disagreements will be respected equally
  - Voluntary decision
  - Mental competence
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.



## **Appendix 4**

### **Child Sexual Exploitation (CSE)**

The sexual exploitation of children and young people (CSE) under-18 is defined as that which:

‘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’ (DfE February 2017).

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591903/CSE\\_Guidance\\_Core\\_Document\\_13.02.2017.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf)

The definition and further guidelines can be found in the DfE document: [Child Sexual Exploitation - Definition and a Guide for Practitioners](#)

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

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

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

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

#### **WARNING SIGNS AND VULNERABILITIES CHECKLIST**

The evidence available points to several factors that can increase a child’s vulnerability to being sexually exploited. The following are typical vulnerabilities in children prior to abuse:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality)
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of ‘honour’-based violence, physical and emotional abuse and neglect)
- Recent bereavement or loss

- Gang association either through relatives, peers or intimate relationships (in cases of gang-associated CSE only)
- Attending school with young people who are sexually exploited
- Learning disabilities
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families
- Friends with young people who are sexually exploited
- Homeless
- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation or a foyer
- Low self-esteem or self-confidence
- Young carer

The following signs and behaviour are generally seen in children who are **already being sexually exploited**:

- Missing from home or care
- Physical injuries
- Drug or alcohol misuse
- Involvement in offending
- Repeat sexually-transmitted infections, pregnancy and terminations
- Absent from school
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- Estranged from their family
- Receipt of gifts from unknown sources
- Recruiting others into exploitative situations
- Poor mental health
- Self-harm
- Thoughts of or attempts at suicide

Evidence shows that any child displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual exploitation.

All schools should ensure that there is a dedicated lead person with responsibility for implementing local guidance in respect of child sexual exploitation. This would normally be the DSL.

The DSL must ensure they are aware of the guidance on Child Sexual Exploitation on the West Midlands Safeguarding Children Procedures: [West Midland Safeguarding Children Procedures](#) website

The DSL must ensure that all staff are aware of signs and symptoms of CSE and know that these must be reported and recorded as child protection concerns. The DSL must follow the LSCB Pathway for dealing with issues of CSE, including completion of the screening tool.

## Appendix 5

### Effects of domestic abuse on children and young people

The impact of domestic abuse on the quality of a child's or young person's life is very significant. Children and young people who live with domestic abuse are at increased risk of behavioural problems, emotional trauma, and mental health difficulties in adult life.

The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

**Physical:** Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour, or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

**Sexual:** There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

**Economic:** The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development.

**Emotional:** Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

**Isolation:** Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from school as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

**Threats:** Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the five outcomes as outlined in the Every Child Matters agenda:

- be healthy;
- stay safe;
- enjoy and achieve;
- make a positive contribution;
- achieve economic well-being.

### **What you might see in school**

- Unexplained absences or lateness – either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school;
- Children and young people attending school when ill rather than staying at home;
- Children and young people not completing their homework, or making constant excuses, because of what is happening at home;
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home;
- Children and young people displaying difficulties in their cognitive and school performance;
- Children and young people whose behaviour and personality changes dramatically;
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations;
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims;
- Children and young people who are no trouble at all.
- This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

## **What schools can do**

**Schools can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.**

For many victims, the school might be the one place that they visit without their abusive partner.

We display posters with information about domestic abuse and contact details for useful agencies: for example, NSPCC 0808 800 5000 and ChildLine 0800 11 11; Parentline 0808 800 2222; Worcestershire's Forum Against Domestic Abuse and Sexual Violence (WFADSA) website and West Mercia Women's Aid 24 hr. helpline: 0800 980 3331. West Mercia Constabulary - Police Domestic Abuse Units 101.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by schools as part of the whole school ethos.

### **Schools can support individual children and young people by:**

- Introducing a whole-school philosophy that domestic abuse is unacceptable;
- Responding to disclosures and potential child protection concerns; recognising that domestic abuse and forced marriage may be a child protection concern; policies and procedures must include domestic abuse;
- Giving emotional support – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.;
- Facilitating a peer support network – children and young people can become isolated but often welcome talking to friends about their problems;
- Offering practical support – if children or young people are new to the school they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.;
- Providing somewhere safe and quiet to do their homework or just to sit and think;
- Improving the self-esteem and confidence of children and young people by:
  - offering them opportunities to take on new roles and responsibilities;

- offering tasks which are achievable and giving praise and encouragement;
- monitoring their behaviour and setting clear limits;
- criticising the action, not the person;
- helping them to feel a sense of control in their school lives;
- involving them in decision making;
- helping them to be more assertive;
- respecting them as individuals;
- encouraging involvement in extra-curricular activities.

From The Expect Respect Education Toolkit – Women’s Aid

### **Operation Encompass**

Operation Encompass is a police and education early information sharing partnership enabling schools to offer immediate support for children and young people experiencing domestic abuse. Where appropriate, information is shared by the police with the school.

#### **On receiving a Domestic Abuse notification, the DSL should:**

- complete the Operation Encompass referral record
- notify HouseM and where appropriate Head of Year
- If there's no change to the child’s behaviour - just monitor and log the DA
- If the child displays poor behaviour choices /seems upset/withdrawn, offer the relevant support needed

Malvern College will act promptly on advice given by the Police, and with regard to Operation Encompass protocols.

#### **Bear in mind**

- Victim of incident may be anxious that the information will be shared inappropriately.
- Notification may not give details as to which parent is the perpetrator/victim – any disclosure to the ‘wrong’ parent could heighten risk.
- Need to be aware who is ‘connected’ to the child – e.g. member of staff may be child’s relative / friend of the family.
- Inappropriate sharing of information could heighten the risk for the victim and/or the child.

**If in doubt, consult with the Family Front Door (01905 822666)**



## **APPENDIX 6**

### **Forced Marriage – a form of Domestic Abuse and a crime in England and Wales.**

**Forced Marriage should be recognised as a human rights abuse – and should always invoke child protection procedures within the school.**

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.

A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

#### **Warning signs**

Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

#### **The justifications**

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon – there have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parents who force their children to marry often justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

## **Culture**

Often parents believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parents come under significant pressure from their extended families to get their children married.

## **The law**

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

In addition, the Forced Marriage (Civil Protection) Act (2007) makes provision for protecting children, young people and adults from being forced into marriage without their full and free consent through Forced Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence.

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence, with effect from 16<sup>th</sup> June 2014, to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the marriage takes place);
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured into it or not).

## **What to do if a student seeks help**

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to Children's Services, you will need to consider whether to respect the student's wishes – or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform the student.
- Establish whether there is a family history of forced marriage – i.e. siblings forced to marry.

- Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Liaise with Police and Children's Services to establish if any incidents concerning the family have been reported.
- Refer to the local Police Child Protection Unit if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

### **What to do if the student is going abroad imminently**

The Forced Marriage Unit advises education professionals to gather the following information if at all possible – it will help the unit to locate the student and to repatriate her:

- a photocopy of the student's passport for retention – encourage her to keep details of her passport number and the place and date of issue
- as much information as possible about the family (this may need to be gathered discretely)
- full name and date of birth of student under threat
- student's father's name
- any addresses where the student may be staying overseas
- potential spouse's name
- date of the proposed wedding
- the name of the potential spouse's father if known
- addresses of the extended family in the UK and overseas

### **Specific information**

It is also useful to take information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission – in case another person of the same age is produced pretending to be the student.

Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student – a secret mobile telephone, for example, that will function abroad.

### **Forced marriage: what educators should NOT do**

- treat such allegations merely as domestic issues and send the student back to the family home

- ignore what the student has told you or dismiss the need for immediate protection
- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- contact the family in advance of any enquires by the Police, Children's Services or the Forced Marriage Unit, either by telephone or letter
- share information outside child protection information sharing protocols without the express consent of the student
- breach confidentiality except where necessary in order to ensure the student's safety
- attempt to be a mediator

**Further guidance is available from The Forced Marriage Unit:**

Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday

Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500

E-mail: [fmufco@fco.gov.uk](mailto:fmufco@fco.gov.uk) Website: [www.fco.gov.uk/forcedmarriage](http://www.fco.gov.uk/forcedmarriage)

FMU publication: '*Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage*' June 09

See also: '*The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage*' Government Office - November 2008, West Mercia regional procedures and Forced Marriage Guidance on the WSCB <https://www.safeguardingworcestershires.org.uk/>

## Appendix 7

### Female Genital Mutilation (FGM) – a form of Human Rights Abuse

#### **What is FGM?**

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

Type 1 – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris).

Type 2 – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the ‘lips’ that surround the vagina).

Type 3 – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris.

Type 4 – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as ‘female genital cutting’ or female circumcision. Communities tend to use local names for this practice, including ‘sunna’.

#### **Why is FGM carried out?**

It is believed that:

- It brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage.
- It preserves a girl’s virginity/chastity.
- It is part of being a woman as a rite of passage.
- It upholds the family honour.
- It cleanses and purifies the girl.
- It gives the girl and her family a sense of belonging to the community.
- It fulfills a religious requirement believed to exist.
- It perpetuates a custom/tradition.
- It helps girls and women to be clean and hygienic.
- It is cosmetically desirable.
- It is mistakenly believed to make childbirth safer for the infant.

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them 'a better Muslim'. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

Within which communities is FGM known to be practised?

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leone, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

### **Is FGM harmful?**

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl's own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

## **Is it illegal?**

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004:

### **The act makes it illegal to:**

- practise FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country
- aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

## **Signs, symptoms and indicators**

The following list of possible signs and indicators are not diagnostic but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- a child talking about getting ready for a special ceremony
- a family arranging a long break abroad
- a child's family being from one of the 'at-risk' communities for FGM (see above)
- knowledge that an older sibling has undergone FGM
- a young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child has undergone FGM:

- prolonged absence from school or other activities
- behaviour change on return from a holiday abroad, such as the child being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still, and looking uncomfortable
- complaining about pain between their legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinary tract infection
- disclosure.

## **Breast Ironing:**

**What is breast ironing?**

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

### **Why does breast ironing happen?**

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

### **Breast ironing is physical abuse**

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

### **Breast Ironing in the UK**

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. Keeping Children Safe in Education (2019) mentions breast ironing on page 83, as part of the section on so-called 'honour-based' violence. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

### **What should schools do?**

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the Police as required by the mandatory reporting duty. Schools should not:

- contact the parents before seeking advice from children's social care;
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or breast ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM or Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

The 'one chance' rule

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

### **Mandatory Reporting Duty**

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Further information on when and how to make a report can be found in the following Home Office guidance: [Mandatory Reporting of FGM](#)

(October 2015).

## **Appendix 8** **SEXTING**

### **What is sexting?**

Sexting is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet.

Sexting is often seen as flirting by children and young people who think that it's part of normal life.

Often, incidents of sexting are not clear-cut or isolated; schools may encounter a variety of scenarios. Sexting incidents can be divided into two categories – aggravated and experimental:

**Aggravated incidents** of sexting involve criminal or abusive elements beyond the creation of an image. These include further elements, adult involvement or criminal or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who is pictured.

**Experimental incidents** of sexting involve youths taking pictures of themselves to share with established boy or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking. There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation.

The consequences of sexting can be devastating for young people. In extreme cases it can result in suicide or a criminal record, isolation and vulnerability. Young people can end up being criminalised for sharing an apparently innocently image which may have, in fact, been created for exploitative reasons.

Because of the prevalence of sexting, young people are not always aware that their actions are illegal. In fact, sexting as a term is not something that is recognised by young people and the 'cultural norms' for adults can be somewhat different. Some celebrities have made comments which appear to endorse sexting – 'it's okay, as long as you hide your face' - giving the impression that sexting is normal and acceptable. However, in the context of the law it is an illegal activity and young people must be made aware of this.

**The Law** - Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. 'Indecent' is not defined in legislation. For most purposes, if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered

indecent. Indecent images may also include overtly sexual images of young people in their underwear.

The law criminalising indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children. Despite this, young people who share sexual imagery of themselves, or peers, are breaking the law.

The National Police Chiefs Council (NPCC) has made clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues. Schools may respond to incidents without involving the police. Where the police are notified of incidents of youth produced sexual imagery they are obliged, under the Home Office Counting rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a 'crime' and the young person involved will be listed as a 'suspect.' This is not the same as having a criminal record.

Every 'crime' recorded on police systems has to be assigned an outcome from a predefined list of outcome codes. As of January 2016, the Home Office launched a new outcome code (outcome 21) to help formalise the discretion available to the police when handling crimes such as youth produced sexual imagery. This means that even though a young person has broken the law and the police could provide evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest.

**Reprinted from Wolak and Finkelhor 'Sexting: a Typology' March 2011**

### **Action to take in the case of an incident of sexting**

#### **Step 1 – Disclosure by a student**

Sexting disclosures should follow the normal safeguarding practices and protocols. A student is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to Social Care.

The following questions will help decide upon the best course of action:

- Is the student disclosing about themselves receiving an image, sending an image or sharing an image?
- What sort of image is it? Is it potentially illegal or is it inappropriate?
- Are the school child protection and safeguarding policies and practices being followed? For example, has the DSL been consulted and is their advice and support available?
- How widely has the image been shared and is the device in their possession?

- Is it a school device or a personal device?
- Does the student need immediate support and or protection?
- Are there other students and or young people involved?
- Do they know where the image has ended up?

This situation will need to be handled very sensitively. Whatever the nature of the incident, ensure school safeguarding and child protection policies and practices are adhered to.

## **Step 2 – Searching a device**

It is highly likely that the image will have been created and potentially shared through mobile devices. The image may not be on one single device, but may be on a website or on a multitude of devices; it may be on either a school-owned or personal device. It is important to establish the location of the image but be aware that this may be distressing for the young person involved, so be conscious of the support they may need.

When searching a mobile device the following conditions should apply:

- The action is in accordance with the school’s child protection and safeguarding policies
- The search is conducted by the Headmaster or a person authorised by them
- A member of the safeguarding team is present
- The search is conducted by a member of the same sex

If any illegal images of a child are found you should consider whether to inform the police. As a general rule it will almost always be proportionate to refer any incident involving “aggravated” sharing of images to the police, whereas purely “experimental” conduct may proportionately be dealt with without such referral, most particularly if it involves the child sharing images of themselves.

Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the police.

If an “experimental” incident is not referred to the police the reasons for this should be recorded in writing.

Always put the child first. Do not search the device if this will cause additional stress to the student/person whose image has been distributed.

If there is an indecent image of a child on a website or a social networking site then you should report the image to the site hosting it. In the case of a sexting incident involving a child or young person where you feel that they may be at risk of abuse then you should report the incident directly to CEOP [www.ceop.police.uk/ceop-report](http://www.ceop.police.uk/ceop-report) so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

## **Step 3 – What to do and not do with the image**

If the image has been shared across a personal mobile device:

- Confiscate and secure the device;
- Don't view the image unless there is a clear reason to do so;

- Don't send, share or save the image anywhere;
- Don't allow students to view images or send, share or save them anywhere.

If the image has been shared across a school network, a website or social network:

- Block the network to all users and isolate the image;
- Don't send or print the image;
- Don't move the material from one place to another;
- Don't view the image outside of the protocols of your safeguarding policies and procedures.

#### **Step 4 – Who should deal with the incident?**

Whoever the initial disclosure is made to must act in accordance with the school safeguarding policy, ensuring that the DSL or a senior member of staff is involved in dealing with the incident.

The DSL should always record the incident. Senior management should also always be informed. There may be instances where the image needs to be viewed and this should be done in accordance with protocols. The best interests of the child should always come first; if viewing the image is likely to cause additional stress, staff should make a judgement about whether or not it is appropriate to do so.

#### **Step 5 - Deciding on a response**

There may be a multitude of reasons why a student has engaged in sexting – it may be a romantic/sexual exploration scenario or it may be due to coercion.

It is important to remember that it won't always be appropriate to inform the police; this will depend on the nature of the incident. However, as a school it is important that incidents are consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere.

#### **If indecent images of a child are found:**

- Act in accordance with your child protection and safeguarding policy, e.g. notify DSL
- Store the device securely
- Carry out a risk assessment in relation to the young person (see Appendix B of the Safeguarding Children in Education Guidance for a Sexting Risk Assessment pro-forma and flow chart)
- Make a referral if needed
- Contact the police (if appropriate)
- Put the necessary safeguards in place for the student, e.g. they may need counselling support, immediate protection and parents must also be informed.
- Inform parents and/or carers about the incident and how it is being managed.

### **Step 6 – Contacting other agencies (making a referral)**

If the nature of the incident is high-risk, consider contacting Children's Social Care. Depending on the nature of the incident and the response you may also consider contacting local police or referring the incident to CEOP.

Understanding the nature of the incident, whether experimental or aggravated, will help to determine the appropriate course of action.

### **Step 7 – Containing the incident and managing pupil reaction**

Sadly, there are cases in which victims of sexting have had to leave or change schools because of the impact the incident has had on them. The student will be anxious about who has seen the image and where it has ended up. They will seek reassurance regarding its removal from the platform on which it was shared. They are likely to need support from the school, their parents and their friends. Education programmes can reinforce to all students the impact and severe consequences that this behaviour can have. Consider engaging with your local police and asking them to talk to the students.

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students. The school, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected. The students' parents should usually be told what has happened so that they can keep a watchful eye over their child, especially when they are online at home.

Creating a supportive environment for students in relation to the incident is very important.

### **Step 8 – Reviewing outcomes and procedures to prevent further incidences**

As with all incidents, a review process ensures that the matter has been managed effectively and that the school has the capacity to learn and improve its handling procedures. Incidents of sexting can be daunting for a school to manage, especially if the image has been widely shared between pupils in school.

Further information is available from the [NSPCC](#)



## **Appendix 9**

### **RADICALISATION AND EXTREMISM**

#### **Preventing Radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' safeguarding approach.

**Extremism** is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

**Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

#### **What is Prevent?**

Prevent is the Government's strategy to stop people becoming terrorists or supporting terrorism, in all its forms. Prevent works at the pre-criminal stage by using early intervention to encourage individuals and communities to challenge extremist and terrorist ideology and behaviour.

The Counter-Terrorism and Security Act (2015), places a duty on specified authorities, including schools and colleges, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty"). The Prevent duty reinforces existing duties placed upon educational establishments for keeping children safe by:

- Ensuring a broad and balanced curriculum is in place schools to promote the spiritual, moral, social and cultural development of pupils;
- Assessing the risk of pupils being drawn into extremist views;
- Ensuring safeguarding arrangements by working in partnership with local authorities, police and communities;
- Training staff to provide them with the knowledge and ability to identify pupils at risk;
- Keeping pupils safe online, using effective filtering and usage policies.

#### **Warning Signs/Indicators of Concern**

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.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors. It is vital that school staff are able to recognise those vulnerabilities. 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.

**Factors which may make pupils more vulnerable may include:**

- Identity Crisis: the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- Personal Crisis: the pupil may be experiencing family tensions; a sense of isolation; 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 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 pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality: involvement with criminal groups, imprisonment, poor resettlement or reintegration.
- Special Educational Need: pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

**Pupils who are vulnerable to radicalisation may also be experiencing:**

- Substance and alcohol misuse
- Pressure
- Influence from older people or via the Internet
- Bullying
- Domestic violence
- Race/hate crime

**Behaviours which may indicate a child is at risk of being radicalised or exposed to extremist views could include:**

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Pupils accessing extremist material online, including through social networking sites;
- Possessing or accessing materials or symbols associated with an extremist cause;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Pupils voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues;
- Graffiti symbols, writing or art work promoting extremist messages or images;

- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause;
- Changing their style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause;
- Using insulting to derogatory names for another group;
- Increase in prejudice-related incidents committed by that person – these may include:
  - physical or verbal assault
  - provocative behaviour
  - damage to property
  - derogatory name calling
  - possession of prejudice-related materials
  - prejudice related ridicule or name calling
  - inappropriate forms of address
  - refusal to co-operate
  - attempts to recruit to prejudice-related organisations
  - condoning or supporting violence towards others
  - Parental reports of changes in behaviour, friendship or actions and requests for assistance;
  - Partner schools, local authority services, and police reports of issues affecting pupils in other schools.

## **Referral Process**

All concerns about young people vulnerable to radicalisation should be referred to the DSL in the first instance. The DSL will follow safeguarding procedures including:

- Talking to the young person about their behaviour/views/on-line activity/friends etc.;
- Discussion with parents/carers about the concerns;
- Checking out on-line activity, including social media if possible;
- Providing in-house support, if available;
- Providing Early Help targeted support if necessary.
- Refer to the Channel programme

If concerns persist, then the DSL should make a referral to the Family Front Door, normally with the knowledge and consent of the young person.

The referral will then be subject to a triage process to decide whether or not it meets the threshold for a referral to Channel. If it does, the DSL should be prepared to attend the Channel Panel meeting to share the concerns and help identify any intervention required.

Further feedback to the Channel Panel will be expected following intervention to decide whether there are still concerns. Further information can be found in the West Midland Safeguarding Children Procedures.

## Appendix 10 CRIMINAL EXPLOITATION – COUNTY LINES

### **What is County Lines?**

County Lines is a very serious issue where criminal gangs set up a drug dealing operation in a place outside their usual operating area. Gangs will move their drug dealing from big cities (e.g. London, Manchester, Liverpool etc.) to smaller towns and rural areas in order to make more money. This can have a really big effect on the community who live there and bring with it serious criminal behaviour.

### **The UK Government defines county lines as:**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. 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.

Criminal exploitation of children is broader than just county lines and includes, for instance, children forced to work on cannabis farms or to commit theft.

### **Crimes Associated with County Lines**

#### **Drugs**

County lines commonly involves the illegal distribution and dealing of seriously dangerous drugs from one city/town to another. The most common drugs involved are heroin and cocaine (crack and powder), but also MDMA, cannabis, amphetamines and spice.

#### **Violence**

Gangs sometimes use violence to threaten children and young people when recruiting them. Gangs also violently assault children and young people working for them if they

find their drugs or money to be missing. Weapons such as firearms, knives, bats, acid are sometimes used to make violent threats.

### **Exploitation**

Gangs recruit and use children and young people to move drugs and money for them. Children as young as 11 years old are recruited, often using social media. They are exploited and forced to carry drugs between locations, usually on trains or coaches. They are also forced to sell drugs to local users.

### **Sexual Exploitation**

Young girls are often groomed and forced into relationships with gang members and are made to perform sexual acts.

### **Signs to look out for:**

A young person's involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs.

- Are they always going missing from school or their home?
- Are they travelling alone to places far away from home?
- Do they suddenly have lots of money/lots of new clothes/new mobile phones?
- Are they receiving much more calls or texts than usual?
- Are they carrying or selling drugs?
- Are they carrying weapons or know people that have access to weapons?
- Are they in a relationship with or hanging out with someone/people that are older and controlling?
- Do they have unexplained injuries?
- Do they seem very reserved or seem like they have something to hide?
- Do they seem scared?
- Are they self-harming?

### **Terms associated with County Lines**

Here are some words/terms that are commonly used when describing county lines activity. someone using these words might be involved in or might know of County Lines activity.

#### **Cuckooing**

Cuckooing is when drug gangs take over the home of a vulnerable person through violence and intimidation, using it as their base for selling/manufacturing drugs.

#### **Signs of cuckooing:**

- An increase in people coming and going
- An increase in cars or bikes outside
- Litter outside
- Signs of drugs use
- You haven't seen the person who lives there recently or when you have, they have

been anxious or distracted.

### **Going Country**

This is the most popular term that describes County Lines activity. It can also mean the act of travelling to another city/town to deliver drugs or money.

### **Trapping**

The act of selling drugs. Trapping can refer to the act of moving drugs from one town to another or the act of selling drugs in one.

### **Trap House**

A building used as a base from where drugs are sold (or sometimes manufactured). These houses usually are occupied by someone (usually adult drug users) but sometimes young people are forced to stay in trap houses.

### **Trap line**

This refers to when someone owns a mobile phone specifically for the purpose of running and selling of drugs.

### **What to do if you have a concern a young person is involved in County Lines**

Follow your normal safeguarding procedures and refer to your school's DSL. The DSL will refer on to Children's Social Care and/or the Police, if the young person is at immediate risk of harm.

Further information is available in the regional guidance of the 'West Midlands Child Protection Procedures'.

Further guidance is available in the Home Office's publication 'County Lines: criminal exploitation of children and vulnerable adults'.

## Useful Telephone Numbers

In case you need someone to talk to...

### Childline

0800 1111

[www.childline.org.uk](http://www.childline.org.uk)

### NSPCC

0808 800 5000

[www.nspcc.org.uk](http://www.nspcc.org.uk)

### Rape Crisis

0808 802 99 99

### The Samaritans

116 123

[www.samaritans.org](http://www.samaritans.org)

### Children's Services

(Family Front Door) (Worcs.)

01905 822 666

### Children's Commissioner

Anne Longfield OBE

020 7783 8330 (Monday-Friday, 9am-5pm)

[advice.team@childrenscommissioner.gsi.gov.uk](mailto:advice.team@childrenscommissioner.gsi.gov.uk)

[www.childrenscommissioner.gov.uk](http://www.childrenscommissioner.gov.uk)

### Independent Schools' Inspectorate

020 7600 0100

### Prospect View Health Centre

01684 584 050

### Young Minds Crisis Messenger

Text YM to 85258

<https://youngminds.org.uk/find-help/get-urgent-help/youngminds-crisis-messenger/>

### Terrence Higgins Trust

AIDS / HIV & Sexual Health Advice

0800 802 1221

### FRANK – Confidential Drugs Advice

0300 123 6600

### Brook Sexual Health Line for Under 25s

0808 802 1234

### Anti-Bullying

0808 800 2222

[www.bullying.co.uk](http://www.bullying.co.uk)

[www.beatbullying.org](http://www.beatbullying.org)

[www.kidscape.org.uk](http://www.kidscape.org.uk)

## College Numbers

### College Designated Safeguarding Lead

Mrs Bijl [penny.bijl@malverncollege.org.uk](mailto:penny.bijl@malverncollege.org.uk)

01684 581 609

### Deputy Designated Safeguarding Lead

Mrs Vanessa Young [vanessa.young@malverncollege.org.uk](mailto:vanessa.young@malverncollege.org.uk)

01684 581 699

### College Pastoral Team

Mrs Angus – 01684 581 504 (Senior Deputy Head)

Mrs Bijl – 01684 581 609 (DSL)

Mr Faulkner – 01684 581 691 (DH: Pastoral & DDSL)

Mr Mrs Young – 01684 581 669

(DDSL & E-Safety Coordinator)

Rev. Ibbotson – 01684 581 540 (Chaplain)

### College Counsellors

Jane Humphreys – 07971 335 908

Simon Rowe via Medical Centre

### College Medical Centre

Mrs M Tillman – 01684 581 535 (Nurse Manager)

### College's Independent Listeners

Mrs Angela Lafferty – 01684 577 478

Mr Tim Wright – 01684 541 102

## Child Protection and Safeguarding

### Useful Internal Telephone Numbers

#### College Designated

##### Safeguarding Lead (DSL)

Mrs Bijl: 01684 581 609

Pavilion

[penny.bijl@malverncollege.org.uk](mailto:penny.bijl@malverncollege.org.uk)

#### Deputy DSL

Mrs Young: 01684 581 699

D.T Department

[vanessa.young@malverncollege.org.uk](mailto:vanessa.young@malverncollege.org.uk)

#### Pastoral Team

##### Mrs Angus

01684 581 504

Senior Deputy Head Office / Main Building

[sarah.angus@malverncollege.org.uk](mailto:sarah.angus@malverncollege.org.uk)

##### Mrs Bijl

01684 581 609

Pavilion

[penny.bijl@malverncollege.org.uk](mailto:penny.bijl@malverncollege.org.uk)

##### Rev. Ibbotson

01684 581 540

Chapel

[david.ibbotson@malverncollege.org.uk](mailto:david.ibbotson@malverncollege.org.uk)

##### Mr Faulkner (Deputy DSL)

01684 581 691

Science Department

[lewis.faulkner@malverncollege.org.uk](mailto:lewis.faulkner@malverncollege.org.uk)

##### Mrs Young – E Safety Coordinator

01684 581 699

Design & Technology Department

[vanessa.young@malverncollege.org.uk](mailto:vanessa.young@malverncollege.org.uk)

#### College Counsellors

Jane Humphreys & Simon Rowe

Medical Centre

01684 581 535

#### Counselling Drop-In Service

(no appointment necessary)

Monday and Wednesday

4.30-5.30pm in the Medical Centre

#### College's Independent Listeners

Mrs Angela Lafferty – 01684 577 478

Mr Tim Wright – 01684 541 102

#### College Medical Centre

Nurse Manager: Mrs M Tillman

01684 581 535

[nurse.manager@malverncollege.org.uk](mailto:nurse.manager@malverncollege.org.uk)

#### College Safeguarding Governors

Professor Ken Davey

Mrs Fiona Bridge

Mrs Sue Raby-Smith

##### Contact via Clerk to Council

[bursaroffice@malverncollege.org.uk](mailto:bursaroffice@malverncollege.org.uk)

#### Chairman of College Council

Mr Robin Black

##### Contact via Clerk to Council

[bursaroffice@malverncollege.org.uk](mailto:bursaroffice@malverncollege.org.uk)

#### Children's Services

01905 822 666



# MALVERN COLLEGE

## **Mrs Bijl:**

Designated Safeguarding Lead and the Head of Pupil Well-Being



Please email [penny.bijl@malverncollege.org.uk](mailto:penny.bijl@malverncollege.org.uk) or available in The Pavilion or South Lodge, or phone DDI: 01684 581609

## **Mrs Young**

Deputy DSL

E-Safety Co-ordinator



Please email  
[vanessa.young@malverncollege.org.uk](mailto:vanessa.young@malverncollege.org.uk)  
or available in Design Technology or  
phone DDI: 01684 581699

## **Mr Faulkner**

Deputy Head Pastoral

Deputy DSL



Please email  
[lewis.faulkner@malverncollege.org.uk](mailto:lewis.faulkner@malverncollege.org.uk)  
or available in Science Dept or phone  
DDI: 01684 581691