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Kingston Educational Trust

# School: Fern Hill Primary

## Safeguarding and Child Protection Policy

September 2024

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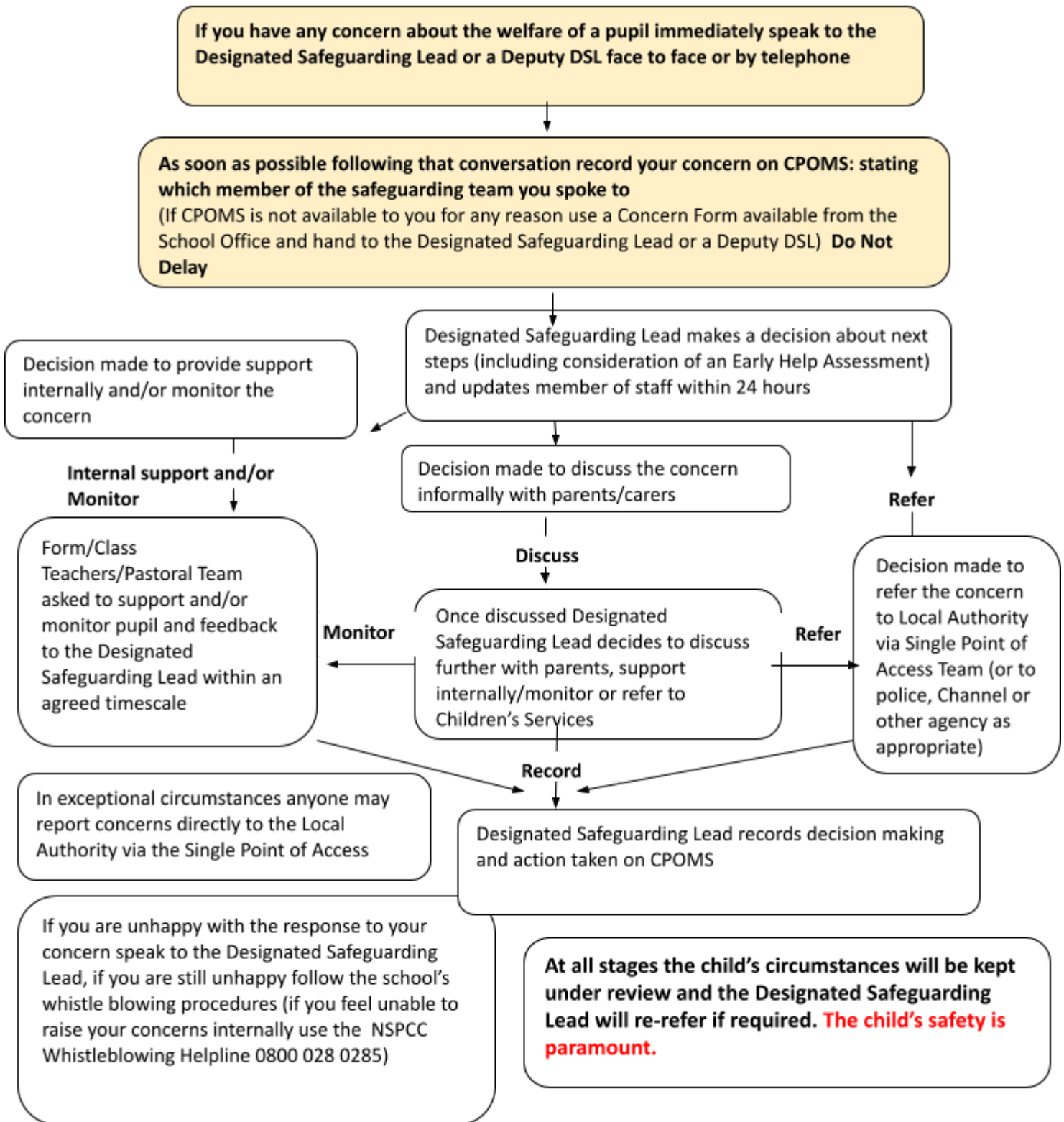
If you are concerned about the welfare of a pupil now go straight to section 4 on page 9

Status	Statutory policy
Date approved	15 July 2024
Approved by	Kingston Educational Trust Board <b>Note:</b> school specific sections are subject to review by the Local Academy Committee
School Lead	Headteacher/Designated Safeguarding Lead
Frequency of policy review	Annual
Next Review due	July 2025
Last review	July 2023

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**KEY CONTACT DETAILS: Fern Hill Primary**

<b>Safeguarding Team:</b>		
Samantha Stephenson Deputy Headteacher	Designated Safeguarding Lead (DSL)	0208 247 0300 ext 352/333
Andrea Stewart Welfare Lead	Deputy DSL (DDSL)	
Adam Scott, Headteacher	Deputy DSL (DDSL)	
Rachael Crook Deputy Headteacher	Deputy DSL (DDSL)	
<b>SENCO</b>		
Samantha Stephenson, Deputy Headteacher		
<b>Designated Teacher for Children Looked After and Children Previously Looked and Young Carers</b>		
Adam Scott - Headteacher		
<b>Mental Health Leads</b>		
Samantha Stephenson - Deputy Headteacher, Andrea Stewart - Welfare Lead		
<b>First Aiders: Names and photographs displayed on posters around school</b>		
<b>Mental Health First Aiders: Names and photographs displayed on posters around school</b>		
<b>Chair of Kingston Educational Trust Board:</b>		
Graham Willett, Trustee	Email: gwillett@kingstoneducationaltrust.org	
<b>Executive Director Kingston Educational Trust:</b>		
Sophie Cavanagh	Email: director@kingstoneducationaltrust.org	
<b>Lead Safeguarding Trustee (Board level)</b>		
Sue Conder, Trustee	Email: sconder@kingstoneducationaltrust.org	
<b>Chair of the Fern Hill Local Academy Committee</b>		
Sean Weston, Trustee	Email: sweston@kingstoneducationaltrust.org	
<b>Safeguarding Lead for Fern Hill Local Academy Committee</b>		
Mark Clutterbuck, Trust Associate	Email: mclutterbuck@kingstoneducationaltrust.org	
<b>Local Authority (contact the relevant team according to the pupil's home address):</b>		

Kingston and Richmond	<p><b>Children's Services</b> for Kingston and Richmond are contacted via <b>the Single Point of Access (SPA) Team</b>: 020 8547 5008 from 8am to 6pm, Monday to Friday and at other times via the out of hours duty social worker 020 8770 5000 (Kingston)/020 8744 2442 (Richmond)</p> <p>The <b>Local Authority Designated Officer (LADO)</b> is contacted via the SPA Team or by calling <b>07774 332675</b> or emailing <a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a></p>
Hammersmith and Fulham	0208 753 6600 or (out of hours) 020 8748 8588
Hounslow	020 8583 6600 (Monday to Friday, 9am to 5pm) or 020 8583 2222(out of hours)
Merton	020 8545 4226/7 or 020 8770 5000 (out of hours)
Sutton	020 8770 6001 or 020 8770 5000 (out of hours)
Wandsworth	020 8871 6622 or 020 8871 6000 (out of hours)
All other local authorities	Use the online tool <a href="https://www.gov.uk/report-child-abuse-to-local-council">Reporting Abuse to your local council</a> <a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a> to find the relevant contact number
<b>Kingston Police:</b>	<b>101 (or 999 if there is an immediate risk of harm)</b>

## 1. Introduction and Ethos

- 1.1. Kingston Educational Trust (KET) is a community and all staff, trustees, trust associates, families and pupils have an essential role to play in working together to make its schools safe and secure.
- 1.2. At Fern Hill Primary we recognise our moral and statutory responsibilities to safeguard and promote the welfare of all pupils, with their best interests at the centre of our work. Key to this is providing an environment in which pupils feel safe and respected, able to talk openly and with confidence that they will be listened to, taken seriously and supported.
- 1.3. This policy is used in conjunction with staff training and continued professional development to strengthen our whole school approach to safeguarding and to:
  - raise staff awareness of the fundamental need to safeguard children and their responsibilities in maintaining vigilance and identifying and reporting concerns;
  - set out the processes to be followed by all members of staff;
  - emphasise the need for good levels of communication between all members of staff and promote effective working relationships with other agencies, especially Achieving for Children (AfC), the Kingston and Richmond Safeguarding Children Partnership (KRSCP) and the police.
- 1.4. **For the purposes of this policy “staff” includes supply teachers, volunteers, tutors and contractors.** The procedures in this policy apply to all staff and also to trustees/trust associates and reflect KRSCP’s safeguarding arrangements.
- 1.5. This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff sign to say they have read and understood its contents and it is published on the [Policy page](#) of the school website.
- 1.6. This policy will be reviewed at least annually and following any updates to national and local guidance or in response to safeguarding issues as they emerge, including any lessons learnt. If legislation or guidance changes, KET schools will adopt these changes immediately, while awaiting for policy changes to be implemented.

## 2. Statutory framework, key statutory and non-statutory guidance

This policy is based on the Department for Education’s statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#). We follow this guidance and the arrangements agreed and published by our 3 local safeguarding partners (KRSCP), together with the following:

- [London Child Protection Procedures and Practice Guidance](#)
- [Teachers' Standards](#)
- [What to do if You're Worried a Child is Being Abused](#)
- [Equality Act 2010: advice for schools](#)
- [Information Sharing Advice](#)
- [Statutory framework for the early years foundation stage 2023](#)
- [Police and Criminal Evidence Act \(PACE\) Code C](#) (provisions relating to an appropriate adult)

- [Searching, Screening and Confiscation guidance](#).

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, which places a statutory reporting duty on teachers and [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race)
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation.

This policy complies with the Trust's Articles of Association and our funding agreement.

### 3. Definitions of Safeguarding, Child Protection and Abuse

3.1. Safeguarding and promoting the welfare of children (as defined in [Keeping Children Safe in Education September 2024](#)) means:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. **Children** includes everyone under the age of 18.

3.2. **Abuse:** There are four categories of abuse (however abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another):

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Full definitions and example indicators are set out at [Appendix 1](#) of this policy.

**4. Pupil welfare and what to do if you have a concern**

- 4.1. Report:** If staff have **any** concerns about a pupil's welfare (including mental health concerns), they must act on them immediately by reporting their concerns to the Designated Safeguarding Lead (DSL) or if they are not available to a Deputy DSL, either face to face or by telephone.
- 4.2. Record:** A written record must then be made without delay on CPOMS, including a note of which member of the Safeguarding Team the concern was reported to and a record of any visible marks, bruising or injuries that give cause for concern on the body map on the CPOMS incident report. The child should not be examined intimately or photographs taken of any injuries / marks. Anyone without access to CPOMS for any reason, should use a school Concern Form which is available from the Fern Hill staff room and the inclusion office (with a body map if injuries have been observed) and hand it to the DSL/Deputy DSL without delay.
- 4.3. Any expression by a pupil of a wish to end their life or to self harm** must always be treated extremely seriously and a member of staff must remain with them whilst the DSL or a Deputy DSL is contacted.
- 4.4.** If concerns for the welfare of a pupil arise towards the end of the school day, a member of staff must remain with that pupil to ensure that they do not leave the school site until the DSL (or Deputy DSL) has been spoken to and they have made a decision regarding next steps (see the flow chart at the front of this document).
- 4.5.** Staff should exercise professional curiosity and follow up potential indicators that a pupil may have been harmed or be at risk of harm by providing them with an opportunity to talk, for example by asking if they are OK or if they can help in any way. Do not assume that a colleague or another professional will take action.
- 4.6.** Bear in mind that some children may:
- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected;
  - Not recognise their experiences as harmful;
  - Feel embarrassed, humiliated or threatened, this could be due to their vulnerability, disability, sexual orientation and/or language barriers.
- 4.7.** If a pupil does begin to reveal that they are being or have been harmed, follow the disclosure guidance at section 6 below.
- 4.8.** If you are unsure whether something comprises a safeguarding concern you must seek guidance from the DSL or a Deputy and bear in mind that if it is the end of the school week, or the school is about to break up for a holiday, that child may not be seen again for several days or weeks. Staff must not make their own judgements about whether an issue is serious enough to warrant a report to the DSL. What may seem like less serious concerns may be more significant when considered in the light of other information known to the DSL. All concerns must be reported immediately.
- 4.9.** In the case of a physical injury to a child which requires medical treatment a school first aider will make an assessment and provide appropriate treatment if the injury is minor. In the case of a serious injury, or

possible drug overdose, emergency services should be contacted immediately by dialling 999 and their advice followed; the pupil must be sent to hospital via ambulance accompanied by a member of staff and parents informed. In a situation where school staff believe that informing parents may place the pupil at further risk of harm, this decision must be recorded.

- 4.10. When a member of staff raises a concern with the DSL they will be given an update within 24 hours and should feel able to check the progress of a case with the DSL, so that they can reassure themselves the pupil is safe and their welfare is being considered.
- 4.11. If, following this process, any member of staff remains concerned that appropriate action is not being taken, it is the responsibility of that staff member to seek further direct consultation from the Single Point of Access (SPA) team (Telephone: 020 8547 5008) for Kingston and Richmond (for children living outside these boroughs use the online tool [Reporting Abuse to your local council](#) to find the relevant contact number) who may be able to discuss the concern and provide advice on appropriate action to be taken. See also the Whistle Blowing section of this policy.

## 5. What to do if you are unable to contact the Safeguarding Team

- 5.1. Unavailability of the DSL or a Deputy DSL must not delay action being taken in response to a safeguarding concern. In the rare instance of the whole Safeguarding Team being offsite and uncontactable you must immediately:
- report your concern to any member of the Senior Leadership Team explaining that you have been unable to make contact with a member of the Safeguarding Team; or
  - in the absence of any member of SLT, report your concern directly to the local authority Single Point of Access (SPA) Team (see Key Contact Details at the front of this policy).
- 5.2. If you are concerned about the welfare of a child outside the hours in which the Safeguarding Team are available in school or via the safeguarding mobile:
- make a report directly to the local authority Single Point of Access (SPA) Team (see Key Contact Details at the front of this policy);
  - if the concern is of a medical nature the pupil should be taken to Kingston A&E;
  - **if a child is in immediate danger you must call 999.**
- 5.3. If anyone other than the DSL or a Deputy makes a referral to external services for any reason, then the person who has made the referral must inform the DSL (or a Deputy DSL if they cannot be contacted) in person or by telephone as soon as possible.

## 6. What to do if a pupil makes a disclosure to you

- 6.1. If a pupil discloses to you that they may have been harmed or may be at risk of harm:
- **Receive:** Listen carefully to what is being said without interrupting or displaying shock or disbelief and remain non-judgmental. Pupils must never be given the impression that they are creating a problem by making a report or be made to feel ashamed.
  - **Reassure:** Keep calm and reassure them that they are being taken seriously and have done the right thing in speaking to you (e.g. you could say 'I believe you', 'I'm glad you came to me', 'I'm sorry this has happened' or "we are going to do something together to get help").

- Be honest with the pupil and explain what will happen next, but do not make promises you may be unable to keep (such as 'I'll stay with you' or 'everything will be alright now') or promise confidentiality (as you have a duty to refer), but the pupil should be reassured that information will only be shared with those who need to know.
- **Respond:** Respond only so far as necessary for you to establish what the pupil is telling you. Use open questions (eg How? When? Who? Where?) and phrases such as 'tell me what happened'.
- Do not put them under pressure to provide full details and do not ask leading or suggestive questions such as 'Did they do..?'
- Do not criticise the alleged perpetrator, as the pupil may care about them and reconciliation may be possible.
- **Report:** Immediately speak to the DSL or a Deputy (see section 4 above) to report any disclosure of abuse, risk of harm or other welfare concerns. Ensure that any pupil showing signs of distress is not left alone while you do this, but is supervised by a member of staff whilst the report is made.
- **Record:** Once you have spoken to the Safeguarding Team, as soon as possible record the disclosure on CPOMS, including:
  - what was said, using the child's own words,
  - the date, time and location of the disclosure, persons present and any noticeable non-verbal behaviour.

Any handwritten notes made at the time of the disclosure should be signed and dated and then passed to the DSL (it is usually best to wait until the end of the disclosure to make notes, so that you can devote your full attention to the child and listen to what they are saying).

Children **MUST NOT** be asked by staff to make a written statement themselves or to sign any records and their disclosure must not be recorded using any electronic device.

## 7. Systems for pupils to report abuse

Fern Hill Primary recognises the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations or to make a disclosure. To facilitate this we have put in place systems that are easily understood and easily accessible for pupils and ensured these are well promoted. Pupils receive this information in assemblies, generally on a termly basis but also when appropriate to the themes covered, including PSHE and RSE lessons. We make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback.

Pupils can meet face to face with the Safeguarding Team or their trusted adult in school. Classroom Worry Boxes are used and KS2 pupils can use two other worry boxes - this is a facility to report a concern anonymously, should a pupil wish to do so. We recognise that there may be different reasons why someone may wish to report something anonymously and that it may also be that they wish to report a concern about someone else.

More widely, systems have been established to support the empowerment of pupils to talk to a range of adults in school whom they can approach if they are worried or unhappy and know they will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate, these include

- The Welfare Lead and school ELSAs are available to pupils
- Feedback questionnaires from pupils and groups of pupils.

**8. Safeguarding and Child Protection Procedures: what happens after a concern is raised (see the flowchart at the front of this policy)**

- 8.1.** The DSL and Deputies receive and collate information regarding individual pupils, make immediate and ongoing assessments of potential risk and decide actions generally in discussion with parents/carers and as far as possible taking into account the wishes and feelings of the child (subject to the need to safeguard that child and others).
- 8.2.** The DSL or a Deputy DSL will ensure the immediate safety of any child felt to be at serious risk by taking appropriate action and by immediately involving other relevant agencies as necessary, including the local authority children's social care and the police. In other cases a decision will be made whether to refer to other agencies without delay, or to put in place internal support and/or monitor the pupil. The decision making process and outcome is recorded on CPOMS.

**8.3. Notifying Parents/Carers of a safeguarding concern**

Unless the school believes that notifying parents/carers could increase the risk to a child or undermine a police investigation, the school will:

- seek to discuss any concerns about a pupil with their parents/carers at an early stage. This must be handled sensitively and the DSL or a Deputy will make contact with the parent/carer in the event of a concern or disclosure; and
- inform parents/carers in the event of a referral to local authority children's social or to police being necessary.

If parents/carers are not informed the reasons for this will be recorded on CPOMS.

**8.4. Referral to the local authority children's social care**

The DSL or a Deputy DSL will decide whether a referral to the local authority children's social care via the Single Point of Access is appropriate. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves.

- 8.5.** The local authority will make a decision within 1 working day of a referral about what course of action to take and will report back the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available within 48 hours, and ensure outcomes are properly recorded.

- 8.6.** If after a referral the pupil's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the pupil's situation improves.

**8.7. Early Help**

We work closely with local professional agencies including local authority children's social care, the police, health services and other services including voluntary organisations to promote the welfare of children and this includes providing a co-ordinated offer of Early Help when additional needs of children are

identified. 'Early Help' is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse .

If a pupil would benefit from coordinated Early Help the DSL will either take a case to the local Early Help Resilience Network monthly meeting to get multi-agency support or arrange an Early Help inter-agency assessment via the Single Point of Access.

If Early Help is appropriate, the case will be kept under review by the DSL and consideration given to a referral to local authority children's social care if the pupil's situation doesn't appear to be improving.

#### **8.8. Review**

The school's response to safeguarding and child protection issues are reviewed by the Safeguarding Team to determine:

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure?
- Have these been remedied?
- Is further training required?

#### **9. Support for staff**

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful, upsetting or overwhelming. Any member of staff affected by issues arising from concerns for pupils' welfare or safety should seek support from the DSL. Alternatively, staff can seek support at Fern Hill Primary from Sam Stephenson Deputy Headteacher who is able to provide supervision. Staff can also seek external support by accessing RBK's confidential Counselling Service.

#### **10. Whistle Blowing**

- 10.1.** We have a separate whistleblowing policy which is shared with staff on induction (available on the [policy page](#) of the school website).
- 10.2.** Our school works hard to encourage a culture of mutual respect and learning. We welcome comments and feedback and provide staff, pupils and parents with a safe mechanism to raise any concerns.
- 10.3.** All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.
- 10.4.** In the first instance concerns should be raised with the Head teacher, the DSL or the Executive Director (where concerns relate to the Head teacher). If it becomes necessary to consult outside the school, staff should speak to the LADO Service for further guidance and support.
- 10.5.** Members of staff can also access the [The NSPCC Whistleblowing Advice Helpline](#) if they do not feel able to raise concerns regarding child protection failures internally, call: 0800 028 0285 (8:00am to 8:00pm Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**11. Record keeping, confidentiality and information sharing**

- 11.1. Records of concerns regarding individual pupils, action taken, decisions reached and the outcome are held securely and confidentially on CPOMS. Levels of access to CPOMS are in place so that information is only shared with those who have a professional need to access it.
- 11.2. We recognise that to effectively meet a child's needs, safeguard their welfare and protect them from harm, the school must contribute to inter-agency working in line with [Working Together to Safeguard Children \(2023\)](#) and share information between professionals and agencies where there are concerns.
- 11.3. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and UK GDPR is not a barrier to sharing information where the failure to do so would place a child at risk of harm.
- 11.4. The DfE emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."
- 11.5. All staff must be aware that they cannot promise a pupil to keep secrets which might compromise the pupil's safety or wellbeing. It is important that staff tell the pupil in a manner appropriate to their age and development that they cannot promise complete confidentiality and that they may need to pass information on to other professionals to help to keep the pupil or other children safe.
- 11.6. However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the headteacher, DSLs and staff will only disclose information about a pupil to other members of staff on a need to know basis, ensuring that sufficient information is shared so that:
- all relevant staff are alerted to risks and vulnerabilities ensuring pupils can be appropriately monitored and supported; and
  - teachers and other staff understand the challenges pupils may face and are able to provide appropriate support and adjustments to promote their educational outcomes and wellbeing.
- 11.7. The DfE's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- 11.8. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- 11.9. We will always undertake to share our intention to refer a child to SPA with their parents/carers unless to do so could put the pupil at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with SPA on this point.

**KEY SAFEGUARDING ISSUES (SEE ALSO [APPENDIX 2](#) of this policy):**

**12. Procedure for the safe handover of children at the end of the school day**

At Fern Hill Primary all pupils must be collected from school (or from Tree Tops) by a named adult aged 18 and over. Any changes to the named adult must be notified by a parent in writing to the school office and this will be forwarded to the class teacher/Tree Tops.

Pupils may be collected from school or Tree Tops by a named young person under the age of 18 at the discretion of the head teacher. Any request must be made in writing to the school office. If approved by the head teacher, the class teacher/ Tree Tops will be informed.

In an emergency situation, when the named person is unable to collect a child, the school office must be notified by telephone. A member of the Senior Leadership Team will then make a decision regarding the arrangements.

With written parental permission pupils in Y5 and Y6 may walk home unaccompanied.

### **13. Non-collection of children**

At Fern Hill Primary If a child is not collected at the end of the session/day, we will contact the parent and establish the expected time of collection. The pupil may be placed into the after school provision and parents may be charged for this. Should a parent or second contact not be responding to calls by 4:45p.m the school will contact SPA.

### **14. Missing pupils**

At Fern Hill Primary our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

The school site is secure once registers are taken and the school has locked gates. SLT are at exit points at the start and end of the school day. Should a child go missing from their classroom during the school day staff will alert SLT and the safeguarding team. Once found the child will have an opportunity to share with their class teacher or their trusted adult. If deemed necessary the pupil will be allocated a safe place to go to in school if they feel overwhelmed and need to leave their classroom. Parents will be informed.

Any pupil not arriving in class for morning registration that is not accounted for by an office absence call - the school will contact the parent.

### **15. Child mental health issues**

**15.1.** Mental Health problems can in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst only trained professionals can diagnose a mental health problem, school staff are well placed to observe pupils and identify those whose behaviour suggests that they may be experiencing a mental health issue, or be at risk of developing one. These include depression, anxiety, low self-esteem, disordered eating, panic attacks, sleep problems and many other conditions and behaviours. They are often a direct response to what is happening in their lives.

**15.2.** At Fern Hill Primary members of the safeguarding and ELSA team have completed Mental Health First Aider training to help them to recognise the signs and symptoms of mental ill health and to respond to and support pupils experiencing mental health issues and/or emotional distress in school, but in the first instance, any member of staff who has a concern about the mental health of a pupil must immediately report this to the DSL or a Deputy, using the reporting process described above at section 4, and they will determine next steps.

**15.3.** Possible warning signs include:

- Persistent sadness — two or more weeks
- Withdrawing from or avoiding social interactions
- Hurting oneself or talking about hurting oneself
- Talking about death or suicide
- Outbursts or extreme irritability
- Out-of-control behaviour that can be harmful
- Drastic changes in mood, behaviour or personality
- Changes in eating habits
- Loss of weight
- Difficulty sleeping
- Frequent headaches or stomach aches
- Difficulty concentrating
- Changes in academic performance
- Avoiding or missing school

**15.4.** At Fern Hill Primary the following mental health support is available: Parents may request support from the school ELSA or a referral can be completed for external support from a Wellbeing Practitioner. School may also refer through CAMHs for play, art or family therapy or to the Early Advice and Intervention Panel for support from Achieving for Children.

Useful links: [Mental health and behaviour in schools guidance](#) [NSPCC](#) [Mind](#) [Kooth](#)

#### **16. Nude and semi-nude images (also known as ‘sexting’ or ‘youth produced sexual imagery’)**

- 16.1.** Incidents of pupils sharing nudes and semi-nudes are dealt with as safeguarding concerns. Pupils who share nudes and semi-nudes of themselves or other children are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily and we will work in partnership with external agencies, with a view to responding proportionately to the circumstances of any incident and the priority at all times will be the welfare and protection of the young people involved.
- 16.2.** If you are made aware of any incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, confiscate any pupil device on which you believe the image is held and explain that you need to report the incident, reassuring the pupil(s) that they will receive support and help from the Safeguarding Team. You must then immediately report the incident to the DSL or a Deputy, following the process at section 4 above and hand them the device. This is consistent with DfE advice "[Searching, screening and confiscation: advice for schools](#)" (DfE July 2022)
- 16.3.** You must **not**:
- intentionally view the imagery (if you have already inadvertently viewed the imagery report this to the DSL);
  - copy, print or share the imagery (this is illegal);
  - store or save the imagery, or ask a pupil to share or download it;
  - delete the imagery or ask the pupil to delete it;

- ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- say or do anything to blame or shame any young person involved;
- share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.

The school's response will be led by the DSL based on the DfE guidance [Sharing nudes and semi-nudes: how to respond to an incident](#) and [guidance from the UK Council for Internet Safety](#)

- 16.4.** The DSL will discuss the concerns with appropriate staff and speak to the pupils involved as appropriate. Parents and carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- 16.5.** If, at any point in the process, there is concern that a child has been harmed or is at risk of harm, a referral will be made to SPA and/or the police immediately. The police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years of age.
- 16.6.** The DSL will make a judgement about whether a reported sharing nudes and semi-nudes incident is experimental or aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation, sending or showing of images without the knowledge or against the will of a young person who is pictured.
- 16.7.** Aggravated incidents of sharing nudes and semi-nudes will be referred to AfC's Single Point of Access for advice about whether or not a response by the police and/or children's social care is required. This will facilitate consideration of whether:
  - there are any offences that warrant a police investigation;
  - child protection procedures need to be invoked;
  - parents and carers require support in order to safeguard their children;
  - a referral to the Multi-Agency Risk and Vulnerability (MARVE) Panel is required;
  - any of the instigators and/or those directly/indirectly impacted by the behaviour require additional support, this may require the initiation of an early help assessment and the offer of early help services.

Examples of aggravated incidents include:

- evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the individual impacted);
- evidence of coercing, intimidating, bullying, threatening and/or extortion of pupils by one or more others to create and share indecent images of themselves;
- pressure applied to a number of pupils (e.g. all female students in a class or year group) to create and share indecent images of themselves;
- pressurising a pupil who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves;

- dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation);
- what is known about the imagery suggests the content depicts sexual acts that are unusual for the child's developmental stage or are violent;
- sharing of indecent images places a child at immediate risk of harm, for example the child is presenting as suicidal or self-harming.

The DSL will make a judgement about whether or not a situation in which nudes and semi-nudes have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident or whether the school is able to contain the situation in partnership with all parents of the pupils involved, arrange for the parents to ensure that all indecent images are deleted and that the pupils involved learn from the incident in order to keep themselves safe in future. In the latter instance, the DSL will consult with the police and the SPA to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

**16.8.** Adults should not view nudes and semi-nudes unless there is a good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery. Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (it is not possible to establish the facts from the children involved);
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the pupil or parent in making a report;
- is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network;

If it is necessary to view the imagery then the DSL will:

- never copy, print or share the imagery; this is illegal;
- discuss the decision with the headteacher;
- ensure viewing is undertaken by the DSL or deputy DSL with delegated authority from the headteacher;
- ensure viewing takes place with another member of staff present in the room, ideally the head teacher, another DSL or a member of the Senior Leadership Team. The other staff member does not need to view the images;
- wherever possible ensure viewing takes place on school premises, ideally in the headteacher's or DSL's office;
- ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery;
- record the viewing of the imagery in the pupil's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

16.9. If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

**17. Child on child abuse**

17.1. In the context of child on child abuse, we use the terms ‘victim’ and ‘alleged perpetrator(s)’ and ‘perpetrator(s)’ on the basis set out below:

**Victim:** this is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged Perpetrator(s) and Perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what’s appropriate and which terms to use on a case-by-case basis.

17.2. Children are capable of abusing other children both inside and outside school and online (in many cases concurrently). Abusive behaviour must never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, which can normalise abuse and lead to children accepting it and not coming forward to report it, creating an unsafe environment.

17.3. Our pupils are expected to treat all others with respect. Staff must remain vigilant and consistently challenge all inappropriate behaviour and language between pupils, even if it appears to be relatively innocuous as this helps prevent more problematic, abusive and/or violent behaviour in the future.

17.4. Even if there are no reports of child on child abuse in our school, we know that this does not mean it is not happening and staff should assume it is taking place. If staff have any concerns regarding child on child abuse, or receive any disclosure or allegation they must report this immediately to the DSL (or a Deputy) in accordance with section 4 above.

17.5. Child on child abuse can take many forms and includes, but is not limited to:

- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’);
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- forced use of drugs or alcohol;
- sexual violence such as rape, assault by penetration and sexual assault (see definitions below) this may include an online element which facilitates, threatens and/or encourages sexual violence) ;
- sexual harassment (see definition below) such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

- causing someone to engage in sexual activity without consent such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi nude images and/or videos;
- online abuse which can take the form of abusive, harassing, and misogynistic/misandrist (strongly prejudiced against women/men) messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content;
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Some potential issues may be affected by the gender, age, ability and culture of those pupils involved. Children with Special Educational Needs and Disabilities (SEND) and pupils who are Lesbian, Gay, Bi, or Trans (LGBT) or who are perceived to be LGBT by other children are especially vulnerable to child on child abuse.

#### **17.6. Sexual harassment, sexual violence and harmful sexual behaviour**

Sexual violence and sexual harassment can occur between two pupils of any sex. They can also occur through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils. It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal) and are never acceptable. We will ensure that all individuals impacted by sexual violence are taken seriously and offered appropriate support.

Definitions of sexual violence, sexual harassment and of harmful sexual behaviour:

##### **17.6.1. Sexual violence:**

Sexual violence refers to sexual offences under the Sexual Offences Act 2003:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: they intentionally penetrates the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

- **Consent:** Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and have the freedom and capacity to make that choice. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

### **17.6.2. Sexual harassment:**

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names;
- sexual 'jokes' or taunting;
- physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature;
- upskirting;
- online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos; unwanted sexual comments on social media; sexualised online bullying; exploitation; coercion and threats. Online sexual harassment may be stand-alone or part of a wider pattern of sexual harassment and/or sexual violence.

### **17.6.3. Harmful sexual behaviours:**

Children's sexual behaviours exist on a wide continuum as shown below, from normal and developmentally expected to inappropriate, problematic, abusive and violent (the Hackett sexualised behaviour continuum). Harmful sexual behaviours refers to problematic, abusive and violent sexual behaviours which are developmentally inappropriate and may cause developmental damage. For more information see [NSPCC Harmful Sexual Behaviours](#)



When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. A useful tool is: [Beyond Referrals Toolkit](#)

We recognise that pupils displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support. Harmful sexual behaviours will be considered in a child protection context.

#### 17.7. Creating a supportive environment in school and minimising the risk of child on child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment in which pupils feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between pupils, including requesting or sending sexual images;
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards girls, and initiation or hazing type violence with respect to boys;
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent;

- Ensure pupils are able to easily and confidently report abuse (including anonymously) using our reporting systems;
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners;
- Support children who have witnessed sexual violence and do all we can to make sure the victim, alleged perpetrator(s) and any witnesses remain anonymous and are not bullied or harassed as a result of a report having been made;
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment;
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child on child abuse, and how to respond to reports;
  - That even if there are no reports of child on child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”;
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to;
    - A friend may make a report;
    - A member of staff may overhear a conversation;
    - A child’s behaviour might indicate that something is wrong.
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation;
  - That a pupil harming another child could be a sign that they have unmet needs, are being abused themselves, or is a sign of wider issues that require addressing within the culture of the school;
  - The important role staff have to play in preventing child on child abuse and responding where they believe a child may be at risk from it;
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side;
  - That if they have **any** concerns they should speak to the DSL.

**17.8. Our procedures for dealing with allegations of child on child abuse**

When responding to cases of sexual harassment or sexual violence we will follow the statutory guidance set out in Part 5 of [Keeping Children Safe in Education](#) September 2024. The response will be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual

harassment, it is never acceptable and will not be tolerated. All reports are treated seriously, including those that occur online or out of school and regardless of how long it has taken to come forward. We recognise that an initial disclosure may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

Decisions are made on a case by case basis, led by the DSL using their professional judgment and supported by other agencies, such as local authority children's social care and the police as required. The DSL will ensure that the response is proportionate, taking into account the nature of the alleged incident(s), including:

- whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed (as described above);
- intra familial harm and any necessary support for siblings;
- the ages and developmental stages of the children involved and whether there is an imbalance of power between them;
- if the alleged incident is a one-off or a sustained pattern of abuse (which may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between children;
- whether there are ongoing risks to the victim, other children or staff; and
- whether there are other related issues and the wider context, including any links to child sexual exploitation and child criminal exploitation.

Consideration will be given to the wishes of the victim in terms of how any investigation will be progressed and any support that they will be offered. However, ultimately the DSL will have to balance the victim's wishes against the duty to protect them and other children and members of the community.

If a report is going to be made to local authority children's social care and/or the police, we will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations and the best way to protect the victim and their anonymity and to ensure any actions the school takes do not jeopardise a statutory investigation.

An immediate risk and needs assessment will be completed and then kept under review for all reports of sexual violence (and considered on a case by case basis for reports of sexual harassment). It will ensure that appropriate measures are put in place to safeguard and support the victim and the alleged perpetrator (with a named person they can talk to) and the school community. Consideration will also be given to whether there are other victims and support for any children (and adult students/staff) who have witnessed sexual violence.

In circumstances in which professional risk assessments are produced by social workers and/or sexual violence specialists, these will be used to inform the school's approach to supporting and protecting pupils.

We will do everything we reasonably can to protect both the victim and alleged perpetrator from bullying and harassment as a result of any report made and to preserve their anonymity. In particular, support will be provided discreetly without drawing attention to them (for example by withdrawing them from a class or approaching them in the presence of peers) and staff will be told on a need to know basis only. Consideration will also be given to the potential impact of social media in facilitating the spreading of rumours and exposing identities.

A high level of support will be put into place to help perpetrators to understand and overcome the reasons for their behaviour and to protect other children by limiting the likelihood of them abusing again. In appropriate cases the school will work with professionals as required to understand why a child may have abused a peer and to address any needs or underlying trauma that may be causing this.

If a statutory assessment is not appropriate, the DSL (or a deputy) will consider other support mechanisms such as Early Help, specialist support (such as CAMHS) and pastoral support. Early Help can be particularly useful to address nonviolent harmful sexual behaviour and may prevent an escalation of sexual violence.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the pupil and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.

All concerns, decisions and actions taken in response to allegations of sexual harassment and sexual violence are recorded and regularly reviewed by the Safeguarding Team and processes updated to reflect any lessons learnt. Records are also reviewed to identify potential patterns which may indicate wider cultural issues within the school and consideration given to how these can be addressed, including for example staff training, removal of any identified barriers to reporting, adaptations to the pastoral curriculum.

#### **17.9. Application of the behaviour policy and child on child abuse**

The DSL will take a lead role in any consequences for the perpetrator(s) under the school's behaviour policy. In circumstances where this may prejudice an investigation by another body and/or subsequent prosecution the DSL will liaise with the police and/or local authority children's social care to determine this.

#### **17.10. Unsubstantiated, unfounded, false or malicious reports**

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the pupil and/or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate against the individual according to our Behaviour Policy.

**18. Bullying**

We have a separate anti-bullying policy which covers all forms of bullying, e.g. online, racist, homophobic, gender and SEND-related bullying. We keep a record of known bullying incidents, which is shared with and analysed by the Trust's Local Academy Committee. All staff are aware that children with SEND and/or differences or perceived differences are more susceptible to being bullied or being victims of child abuse. If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the headteacher and DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PSHE education. We have a duty to record and regularly report to the local authority incidents of recorded racism within the school.

**19. Online safety and the use of mobile technology and cameras in school****Online safety**

**19.1.** We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. We have a whole school approach to online safety which addresses the 4 key categories of risk (see below), and which protects and educates pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

**19.2.** Details of the filtering and monitoring in place on school devices and networks are included in the separate online safety policy

**The 4 key categories of risk:**

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

**19.3.** Online safety is reflected as required in all relevant policies and is considered when planning the curriculum in all subjects.

**19.4.** At Fern Hill Primary Chromebooks are used in school and the school has an ICT suite with PCs. We recognise that new technologies present risks as well as benefits and educate, guide and support our pupils to use digital technology safely and appropriately.

**19.5.** Children commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, TikTok, Twitter, MSN, Tumblr, Snapchat, Instagram and gaming platforms. Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children. That harm might range from sending hurtful or abusive texts and emails to grooming and enticing children to engage in sexually

harmful conversations, webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

- 19.6. Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to use personal devices or access those sites in school. Many pupils own or have access at home to handheld 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.
- 19.7. The DSL has overall responsibility for online safeguarding within the school.

### **Use of mobile technology in school by pupils and staff**

- 19.8. This section applies to mobile phones and all other personal devices which can be used to access the internet, or to take photographs or video) and applies at all times when pupils are on the school site, or are off site during school activities, day trips, visits or attending sporting fixtures. On residential trips, specific guidelines will be issued by trip leaders on an individual trip basis and as required by the particular circumstances of the trip.
- 19.9. **Pupils: At Fern Hill Primary** pupils are not permitted to keep phones with them during the school day. Phones are held in a secure tray by the class teacher and returned at the end of the day. Parental control apps are advised to monitor appropriate phone use for primary school pupils.
- 19.10. **Staff:** Personal mobile phones or devices must not be used during teaching periods or when on duty or otherwise in the presence of pupils (during which times they must be stored out of sight and switched off or switched to 'silent' mode), unless they are being used for a work related purpose or permission for personal use has been given by a member of the Senior Leadership Team or in emergency circumstances.

#### **19.11. Photographing pupils:**

Staff must not take photographs or videos of pupils on their personal mobile phones, cameras or other devices. If for any reason a photograph or moving image is taken on a personal device or camera this must be reported to the Head teacher without delay and the image must be transferred to a school device and all copies deleted within 24 hours.

For comprehensive details about our school's policy on online safety and the use of mobile phones and cameras, please refer to our online safety policy and Staff Code of Conduct (copies are on the [policy page](#) of the school website).

### **20. Female Genital Mutilation (FGM)**

- 20.1. [Keeping Children Safe in Education](#) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse. It is most commonly carried out without anaesthetic, can cause intense pain and distress with long-lasting, health consequences, including difficulties in childbirth. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Many such procedures are carried out abroad and staff will be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday period. Staff are aware that it is also possible for these procedures to be undertaken in the UK.
- 20.2. Possible factors that suggest a pupil may be at risk, are:

- a child talking about getting ready for a special ceremony;
- a family taking a long trip abroad;
- the child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghanistan, Kurdistan, Indonesia and Pakistan);
- knowledge that the child's sibling has undergone FGM;
- a child talks about going abroad to be 'cut' or to prepare for marriage.

**20.3. Signs that may indicate a child has undergone FGM:**

- Prolonged absence from school and other activities;
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued;
- Bladder or menstrual problems;
- Finding it difficult to sit still and looking uncomfortable;
- Complaining about pain between the 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

**20.4. There is a specific reporting duty that applies to teachers.** Any teacher who either:

- is informed by a girl under 18 that an act of FGM has been carried out on her; or
- observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

must immediately report this to the police, personally. This is a mandatory statutory duty, but the DSL will support the teacher in making the report.

The direct duty for teachers mentioned above does not apply in cases where a pupil is **at risk** of FGM or FGM is suspected but is not known to have been carried out. *Note that it will be very rare for teachers to see visual evidence and there are no circumstances in which a teacher or other member of staff should examine a pupil.*

**20.5. Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **child** must immediately speak to the DSL, following our reporting procedures at section 4.

**20.6. Any member of staff** who suspects a pupil is **at risk** of FGM or suspects that FGM has been carried out, or discovers that a young person aged 18 or over appears to have been a victim of FGM should speak to the DSL and following the reporting process at section 4 of this policy.

(See [Female Genital Mutilation Statutory Guidance](#))

## **21. Radicalisation and extremism**

**21.1.** Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern.

- 21.2.** In an emergency (and when a member of the safeguarding team is not immediately available), staff should call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:
- think someone is in immediate danger;
  - think someone may be planning to travel to join an extremist group;
  - see or hear something that may be terrorist-related
- 21.3.** Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. The government defines extremism as the vocal or active opposition to fundamental British values. We seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to far right/neo-Nazi/white supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist animal rights movements.
- 21.4.** Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online. As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During this stage of their development they are susceptible to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more susceptible to being influenced by extremist ideas.
- 21.5.** We are committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism and recognise the importance of providing a safe space for children to discuss controversial issues and build the resilience and critical thinking skills needed to challenge extremist perspectives. We promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.
- 21.6.** Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils (or staff) will always be challenged and where appropriate dealt with in line with our Behaviour Policy (or Staff Code of Conduct).
- 21.7.** Filters and monitoring are in place to ensure that children are safe from terrorist and extremist material when accessing the internet in school or from a school device.
- 21.8.** Staff are alert to the following possible indicators that a pupil may be at risk:
- Disclosures by pupils of their exposure to extremist actions, views or materials of others outside of school, such as in their homes or community groups, especially where pupils have not actively sought these out;
  - Graffiti symbols, writing or art work promoting extremist messages or images;
  - Pupils accessing extremist material online, including through social networking sites;
  - 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 or settings;
  - Pupils voicing opinions drawn from extremist ideologies and narratives;
  - Use of extremist or 'hate' terms to exclude others or incite violence;

- Intolerance of difference, whether secular or religious or views based on, but not exclusive to, gender, disability, sexual orientation, race or culture;
- Attempts to impose extremist views or practices on others;
- Anti-Western or Anti-British views.

**21.9.** Once a concern has been reported we will follow our safeguarding procedures led by the DSL: possible radicalisation identified in school will be discussed with a pupil's parents and carers, as with any other safeguarding or child protection issue, unless there is reason to believe that doing so would place the child at risk. This may be followed by contact with the Single Point of Access for consultation and further advice and/or making appropriate referrals to the police PREVENT team and Channel programme in order to ensure that children receive appropriate support.

**21.10.** We will also support parents and carers who raise concerns about their children being susceptible to radicalisation.

Parents and staff may find the following websites informative and useful:

[Protecting children from radicalisation: the prevent duty](#)

[Educate against hate](#)

AfC contacts:

- for Kingston: Stephanie Royston-Mitchell, Community Safety and Resilience Principal  
[stephanie.royston-mitchell@kingston.gov.uk](mailto:stephanie.royston-mitchell@kingston.gov.uk)
- for Richmond and Wandsworth: Naheem Bashir, Vulnerabilities Manager  
[Naheem.Bashir@richmondandwandsworth.gov.uk](mailto:Naheem.Bashir@richmondandwandsworth.gov.uk)

## **22. Dealing with low level concerns or allegations about a member of staff (including agency or supply staff, contractors and volunteers)**

**22.1.** We promote an open and transparent culture in which all concerns about any adult working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

**22.2.** Any low level concern or allegation (as described below) must be immediately reported to the Head teacher who will follow the process set out in the separate Allegations of Abuse and Low Level Concerns Policy (available on the [Policy page](#) of the school website). Reports to the Head teacher must be either face to face or by telephone. In their absence the report should be made to the DSL or to a Deputy DSL, who will inform the Head teacher on their return.

**22.3.** Staff do not need to decide whether their concern is a 'low level concern' or is a more serious allegation, that determination will be made by the Head teacher.

**22.4.** If a member of staff believes that there is a conflict of interest in reporting the matter to the Head teacher, they should report directly to the local authority designated officer (LADO) on 020 8891 7370.

**22.5.** Where there are concerns or allegations about the Head teacher, these should be referred to the Executive Director, where concerns relate to the Executive Director these should be referred to the Chair

of the Trust Board. Any allegation or concern made against a trustee or trust associate should be reported to the Head Teacher.

- 22.6.** Fern Hill Primary as an Early Years provider will, where appropriate, inform Ofsted of the allegation and actions taken, within the necessary timescale (see the separate Allegations of Abuse and Low Level Concerns Policy for details).
- 22.7.** Allegations that might indicate a person poses a risk of harm to children are described in [Keeping Children Safe in Education](#) as allegations that they have:
- behaved in a way that has harmed a child, or may have harmed a child and/or
  - possibly committed a criminal offence against or related to a child, and/or
  - behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour that may have happened outside of school, known as ‘transferable risk’).

This is known as the ‘harms test’.

**22.8.** A ‘low level concern’ is any concern, no matter how small, and even if no more than a sense of unease or a ‘nagging doubt’ - that someone working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, but this behaviour does not meet the ‘harms test’ as set out above. Examples are provided in [Keeping Children Safe in Education](#) and could include (but are not limited to):

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating children.

- 22.9.** Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
- 22.10.** Identifying and reporting low level concerns enables behaviour to be addressed at an early stage, can help to prevent abusive behaviour and also protects staff from potential false allegations or misunderstandings.
- 22.11.** The Staff Code of Conduct is read annually by all staff (a copy is available on the [Policy page](#) of the school website) and clearly sets out the standards of professional behaviour expected of all adults working in or on behalf of the school.
- 22.12.** Pupils may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all staff should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. To reduce this risk, all staff should have regard to the [Guidance for safer working practice for those working with children and young people in education settings February 2022](#) (on which much of the Staff Code of Conduct is based).

- 22.13.** If a member of staff believes that they may have acted in a manner which is inconsistent with the Staff Code of Conduct (including inadvertently) they should immediately make a self referral to the Head teacher.

**23. Physical Intervention/Restraint and the use of 'reasonable force'**

- 23.1.** At Fern Hill Primary we promote a positive environment for all staff, pupils, volunteers and visitors. We have a separate document, a Positive Handling Policy. which is available on the [policy page](#) of the school website.
- 23.2.** Staff will always employ de-escalation techniques to stop situations escalating and we acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others. At all times, minimal force is used to prevent injury to another person. Staff who are likely to need to use physical intervention will be appropriately trained.
- 23.3.** All incidents involving physical intervention will be recorded on CPOMS. We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- 23.4.** We recognise that touch is appropriate in the context of working with children, and all staff have been given 'safe practice' guidance in the Staff Code of Conduct to ensure they are clear about their professional boundaries.

**24. Safer Recruitment and responsibility for the Single Central Register**

- 24.1.** We are committed to ensuring that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and who have their welfare and protection as the highest priority.
- 24.2.** The Trust Board, Designated Safeguarding Lead and Head teacher are responsible for ensuring that safer recruitment processes as outlined within the statutory guidance, [Keeping Children Safe in Education](#) are followed, including an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role and that appropriate pre-appointment checks are completed and recorded in the school's Single Central Register:
- 24.3.** Reference should be made to our separate Safer Recruitment and Visiting Service Providers/Volunteers Policy which includes full details of the recruitment process and of the records held on the Single Central Register (available on the Policy page of the Whole School Shared Drive and on the [Policy page](#) of the school website).
- 24.4.** The school's Single Central Register is held centrally and securely by the Trust using HR software and with full access provided to the Designated Safeguarding Lead and to the Head teacher.
- 24.5.** Responsibility for entering information into the Single Central Register is delegated to the Trust's HR Officer.
- 24.6.** Sufficient time must be allowed in the recruitment process for required checks to be completed. In addition, the Head teacher and Designated Safeguarding Lead are jointly responsible for ensuring the HR Officer is informed of any volunteers or other adults coming into school or working with pupils (where this is arranged outside of the centralised recruitment process) and where either a DBS and other checks need

to be undertaken or a record made on the Single Central Register. Again, sufficient time must be allowed for these checks to be completed.

- 24.7. The HR Officer will update the Head teacher and Designated Safeguarding Lead when the checks have been completed and recorded on the Single Central Register.
- 24.8. The Designated Safeguarding Lead is responsible for ensuring that the records held on the Single Central Register are complete. They will check the Single Central Record each time they are advised by the HR Officer that checks have been completed and in addition they will complete a regular monthly check to ensure that the Single Central Register is compliant with all of the requirements of [Keeping Children Safe in Education](#) and that there are no gaps.
- 24.9. Any gaps found in the Single Central Register will be flagged by the Designated Safeguarding Lead with the HR Officer to be actioned as a priority. The Head teacher will be informed of this.
- 24.10. The Trust's Head of People is responsible for checking and ensuring that the HR Officer is completing their duties in relation to the Single Central Register in a timely manner.
- 24.11. The Head teacher is responsible for completing a regular half termly check of the Single Central Register with the Designated Safeguarding Lead to ensure that there are no gaps in the records held and that the Single Central Register is compliant with all of the requirements of [Keeping Children Safe in Education](#).
- 24.12. All checks of the Single Central Register must be recorded on the school's Single Central Record Checking Log.
- 24.13. The trust board is responsible for monitoring whether there are appropriate systems in place for maintaining the Single Central Record and keeping it up to date, and the trust's safeguarding lead for the school will check to make sure that these processes are being carried out and that there are no gaps in the records held on the Single Central Register as part of their termly visit.
- 24.14. A separate tab is held in the Single Central Register for the Trust's Central Services Team and the Executive Director is responsible for maintaining and checking the information in that tab as set out in the Trust's Safer Recruitment policy.

## **25. Security and checking the identity and suitability of visitors**

- 25.1. All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting any concerns.
- 25.2. Appropriate checks are undertaken/supervision maintained in respect of visitors and volunteers coming into school. Unless a visitor/volunteer will be supervised throughout the visit, the member of staff inviting a visitor or volunteer into school must liaise with the Designated Safeguarding Lead in good time, so that they can determine the checks and controls to be put in place.
- 25.3. On arrival all visitors must press a call button to request access to the school. They must explain who they are and the purpose of their visit.

- 25.4.** Visitors will then proceed to the main Reception and explain who they are, the purpose of their visit and who has invited them to the school. All visitors other than parents/carers, will be asked to provide identification, before being admitted past the Maglock doors leading from the Reception area into the school.
- 25.5.** All visitors must sign in using the Invenry system in Reception giving their name, organisation, who they are visiting and their car registration (if they have parked onsite).
- 25.6.** All visitors are provided with details of what they should do if they have any concerns for the safety or wellbeing of any pupil via the Invenry system (and must confirm they have read this) and will also be advised of the school's fire safety procedures and evacuation procedures in an emergency.
- 25.7.** All visitors are required to wear a visitor's lanyard throughout their visit.
- 25.8.** At Fern Hill Primary all members of staff wear a photographic identification badge on a burgundy lanyard marked 'Fern Hill Staff' at all times when on the school site. Differentiated visitors lanyards are used for adults that are DBS checked and can work with children.
- 25.9.** Visitors' point of contact will be asked to come to Reception to receive the visitor, who will remain supervised in the secure waiting area until that time. The contact will then be responsible for the visitor while they are on site. The visitor must not be allowed to move about the site unaccompanied or to be unsupervised at any time unless they have authority from the Head teacher or a member of the Senior Leadership Team (such authority will only be given where the visitor has produced an enhanced DBS Certificate with barred list check and their identity has been checked). These authorised visitors will be given a green lanyard, all other visitors will be given a red lanyard.
- 25.10.** Any visitors who are legitimately on the premises on a regular basis and who potentially have contact with pupils must obtain an enhanced DBS certificate.
- 25.11.** When leaving the school, all visitors must leave via Reception, sign out from the Invenry system and return their identification badge and lanyard.
- 25.12.** Any visitor to the school site who is wearing a red lanyard and is found to be unsupervised must be escorted to Reception and the responsible member of staff contacted. Any visitor who is not wearing any visitor lanyard should be challenged politely to ascertain their identity and their business on the school site. They should then be escorted to Reception to sign in using the Invenry system (and produce proof of identity if required) and be issued with the appropriate visitor badge and lanyard. They should then be escorted to their point of contact or their point of contact will be asked to come to Reception to receive the visitor, who will remain supervised in the secure waiting area until that time. In the event that the visitor refuses to comply, they should be asked to leave the site immediately and the Head teacher (or a member of the Senior Leadership Team in their absence) should be advised at once. The Head teacher (or in their absence a member of the Senior Leadership Team) will consider the situation and decide if it is necessary to inform and seek assistance from the police.
- 25.13.** The school will not accept the behaviour of any visitor (including parents/carers) that threatens school security or makes any pupil or adult feel unsafe. The police may be called and such behaviour may lead to a decision to refuse access for that individual to the school site.

**25.14.** We encourage the use of external agencies or speakers to enrich the experiences of our pupils. Vetting is completed to ensure that messages and activities are consistent with the school's values and ethos and to assess the age appropriateness of what is going to be delivered.

**26. The Use of School Premises by Other Organisations**

**26.1.** Where services or activities are provided separately by another body using the school premises, written assurance is sought that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers.

**26.2.** If this assurance is not achieved then an application to use premises will be refused, for full details see our separate Lettings Policy (copy available in the [Policy page](#) of the school website).

**27. Identified areas of particular risk for our school**

Fern Hill Primary School is committed to the provision of a healthy and safe environment that inspires and supports academic and pastoral achievement. To this end, risk assessments are used to examine any potential for risk of harm as well as to help to identify and put in place specific measures to minimise and manage such risks. Risk assessments take into account the following:

- The school is situated on a busy road and near a pelican crossing;
- A high number of children have English as an additional language;
- The school shares the same site as a secondary school;
- Accessing sports off-site (Thames Young Mariners; PGL residential
- Sharing school site with other agencies; and
- Building work
- Car park/Car parking and vehicle movement

**28. Extended school and off-site arrangements (including alternative provision and foreign exchange trips)**

Where extended school activities are provided by and managed by the school, this safeguarding and child protection policy and procedures apply. When our pupils attend off-site activities, we will ensure that effective child protection arrangements are in place.

When our pupils attend an alternative provision provider, we continue to be responsible for their safeguarding and will obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that we would otherwise perform in respect of our own staff. We follow the [statutory guidance for alternative provision](#). If the provision should be registered, we will check that it is. If it is not required to be registered we will check what safeguards are in place.

**29. Children potentially at a greater risk of harm (both offline and online)**

**29.1.** Some children are more vulnerable to abuse, neglect and exploitation than others. Several factors may contribute to that increased vulnerability, including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; an individual child's personality, behaviour, disability, mental and physical health needs; and family circumstances. Additional barriers can also exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognising children's diverse circumstances. We ensure that all children have the same protection,

regardless of any barriers they may face. To ensure that all of our pupils receive equal protection, we will give special consideration to these children and be particularly alert to their potential need for early help, including those who:

- are disabled or have special educational needs or certain health conditions;
- may experience discrimination due to their race, ethnicity, religion, disability, gender identification or sexuality;
- do not have English as a first language;
- are at risk of is at risk of modern slavery, trafficking, sexual or criminal exploitation or radicalisation;
- are at risk of female genital mutilation (FGM) or forced marriage;
- are persistently absent from education, including persistent absences for part of the school day;
- have mental health needs;
- are young carers;
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- are frequently missing/go missing from education, home or care;
- have experienced multiple suspensions, are at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit;
- are at risk of modern slavery, trafficking, sexual and/or criminal exploitation are at risk of being radicalised or exploited
- are known to be living in difficult situations – for example, transient lifestyles, chaotic home situations or temporary accommodation or are affected by parental substance misuse, domestic abuse and violence or parental mental health needs;
- are misusing drugs or alcohol themselves;
- have a parent or carer in custody , or is affected by parental offending;
- are asylum seekers;
- are looked after by the local authority or otherwise living away from home (including as a privately fostered child) or has returned home to their family from care;
- parent/carer has expressed their intention to remove them from school to be educated at home.

### **29.2. Pupils who have a Social Worker**

Children may need a social worker due to safeguarding and/or welfare needs. This may be due to abuse, neglect or complex family circumstances. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities will share the fact that a child has a social worker with the school, and the DSL will work with and support social workers to help protect vulnerable children and to ensure that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where the school is aware that a child has a social worker, this will inform decisions about safeguarding (including for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **29.3. Children absent from or missing education**

Our attendance policy sets out our robust response to children missing from education, in recognition that this can act as a warning sign to a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation and to help prevent the risk of them going missing in the future.

#### **29.4. Pupils with Special Educational Needs and Disabilities (SEND) and Health Issues**

Pupils with SEND and certain health issues are disproportionately impacted by safeguarding concerns and can face barriers to these being recognised. [Keeping Children Safe in Education \(September 2024\)](#) references that children with SEND are three times more likely to be abused than their peers. Pupils may:

- have an impaired capacity to resist or avoid abuse,
- have a higher risk of being isolated from their peers and are more likely to be affected by bullying (including prejudice based);
- have speech, language and communication needs or other barriers which make it harder to manage difficulties and report challenges or tell others what is happening to them;
- have cognitive difficulties which impact the ability to understand the difference between fact and fiction in online content and the consequences of repeating the content/behaviours in schools

and there is also a risk that indicators of abuse are assumed to be related to the child's condition.

Any reports of abuse or concerns involving children with SEND will therefore require close liaison with the DSL (or Deputy) and the SENCO.

At Fern Hill Primary we ensure that all pupils with SEN, disabilities and health issues which potentially place them at greater risk have additional pastoral support to ensure that their voice is heard and acted upon. This includes: pupils' voice completed with pupils regularly alongside trusted adult check in for vulnerable pupils.

#### **29.5. Pupils who are LGTB+**

At Fern Hill Primary we are aware that children who are lesbian, gay, bi or trans (LGBT), or are perceived to be, can be targeted by other children and that these children have their vulnerability compounded when there is a lack of a trusted adult they can speak to.

#### **29.6. Children Looked After and Children Previously Looked After**

We will ensure that staff have the necessary skills and knowledge to keep children looked after and children previously looked after safe. Appropriate staff will have the information they need in relation to a child looked after's legal status (for example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated) and the level of authority delegated by the caring authority to the carer.

We have appointed a designated teacher, who is responsible for promoting the educational achievement and a culture of high expectations and aspirations of looked-after children and previously looked-after children in line with the [statutory guidance](#) 'Designated teacher for looked-after and previously looked-after children.' The designated teacher for children looked after and also the member of the relevant Local Academy Committee who leads on this area are named at the front of this policy.

#### **29.7. Elective Home Education**

Where a parent/carer has expressed their intention to remove a child from our school to be educated at home, we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant where a child has SEND and/or has a social worker. Once the parent has confirmed in writing their intention to home educate - the school will notify the local authority prior to removing the pupil from roll. Where a child has an EHCP, the local authority will need to review the Plan, working closely with parents/carers.

### **30. The Curriculum and Staying Safe**

We recognise that schools play an essential role in helping pupils to understand and identify the parameters of what is safe and appropriate and acceptable pupil and adult behaviour; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

We use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

At Fern Hill Primary pupils are educated at a level appropriate to their age and ability about a range of safeguarding concerns through personal, social and health education (PSHE) and relationship and sex education (RSE). This includes, but is not limited, to bullying (including online bullying). The local community police assist in delivering appropriate age topics and information in regard to criminal age for responsibility including topics such as use of social media use. Health professionals assist the school by delivering part of the RSE curriculum in Y5 and Y6.

### **31. Staff Induction, Awareness and Training**

#### **31.1. All staff**

All staff are made aware of the school's expectations regarding safe and professional practice on induction, as set out in the Staff Code of Conduct and Acceptable Use Agreements. They also undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety (including filtering and monitoring systems), to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. Induction also includes training on the school's behaviour policy and prevention of bullying.

At Fern Hill staff receive Level 2 safeguarding and child protection training from the local authority as recommended by KRSCP (if staff join mid year this is from the NSPCC) which is refreshed at least every 3 years. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings). Training will:

- be integrated, aligned and considered as part of the whole-trust safeguarding approach and wider staff training, and curriculum planning
- be in line with advice from KRSCP
- have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

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

We are an attachment and trauma friendly school and staff are given training to ensure that they are aware that adverse childhood experiences can have a lasting impact throughout childhood and adolescence and the ways in which they can impact mental health, behaviour and education.

Volunteers will receive appropriate safeguarding training, if applicable. We also ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contracted staff, such as catering staff, are aware of our Safeguarding and Child Protection policy and procedure, and have received appropriate safeguarding training.

### **31.2. The DSL and Deputies**

The DSL and Deputies will undertake Multi Agency Level 3 safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

We demonstrate our engagement with KRSCP by ensuring that the DSL and/or Deputies attend the KRSCP DSL termly forums.

### **31.3. Trustees and Trust Associates**

All trustees and trust associates receive safeguarding training (including online safety) at induction, which is regularly updated. This is to make sure that they:

- have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge;
- can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

## **32. Key Responsibilities**

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Schools form part of the wider safeguarding system for children and play a crucial role in preventative education. This is in the context of a whole-trust approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry (hatred of women/men), homophobia, biphobic and sexual violence/harassment and other prejudicial behaviour and language. This is underpinned by the school's:

- Behaviour policy;
- Pastoral support system; and
- Inclusive programme of age appropriate relationships, sex and health education.

### **32.1. All Staff**

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually. Any questions arising from this review must be resolved with a member of the Safeguarding Team before signing the declaration referenced below.
- Sign a declaration at the beginning of each academic year to confirm that they have read and understood the guidance.

- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
- Consider at all times what is in the best interests of the child.
- Remain vigilant, exercising professional curiosity and maintaining an attitude of 'think of the worst, it could happen here';
- Ensure they are aware of and understand the following:
  - Our systems which support safeguarding, including this child protection and safeguarding policy, the role and identity of the Designated Safeguarding Lead (DSL) and Deputies], the behaviour policy and online safety policy (including the school's filtering and monitoring systems) and their role and responsibilities in respect of them;
  - The need to maintain professional boundaries at all times and meet the expectations set out the Staff Code of Conduct (available in the Policy Folder in the Whole School Shared Drive or on the [policy page](#) of the school website) and to report concerns to the Head teacher about other members of staff where there are indicators that they may not be suitable to work with children or that they have not met the expectations set out in the Staff Code of Conduct;
  - What to look for to identify children who need help or protection, including the signs of different types of abuse, neglect and exploitation, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines);
  - What to do if they identify a concern for the welfare of a pupil or a pupil tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with colleagues and relevant professionals;
  - What to do if a pupil tells them they are being abused, exploited or neglected or is at risk of harm from others or themselves and the importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe;
  - The fact that children can be at risk of harm inside and outside of their home, at school and online;
  - The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children;
  - The safeguarding response to children who go missing from education;
  - The Early Help assessment process and their role in it, including identifying emerging concerns and liaising with the DSL;
  - The process for making referrals to local authority children's social care (and that anyone can make a referral).

Section 31 has information on how staff are supported to fulfil their role through induction and ongoing training.

### 32.2. Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads

The school has appointed a DSL who is a member of the Senior Leadership Team and Deputies who together form the Safeguarding Team (and are identified at the front of this policy). The DSL has overall responsibility for the day to day oversight of safeguarding (including online safety) and child protection systems in school, supported by the other members of the Safeguarding Team. Whilst the activities of the DSL may be delegated to the Deputies, and the response to complex or novel challenges will be discussed within the team, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

#### The DSL will:

- act as the central contact point for all staff to discuss any safeguarding concerns;
- For all vulnerable pupils, overall responsibility to put in place, formally document and implement:
  - evaluations,
  - risk assessments,
  - monitoring strategies,
  - support plans, and
  - reintegration plans (including close monitoring strategies and risk assessments for pupils who have expressed suicidal thoughts or are self-harming. Pastoral and teaching staff must be made aware of the situation).
- Monitor a pupil's progress following any safeguarding incident. Ongoing monitoring may be delegated to another appropriate member of staff who has completed Level 3 safeguarding training, for example a Head of Year, reporting to the DSL.;
- maintain a confidential recording system for safeguarding and child protection concerns, discussions, decisions and the rationale for those decisions, including records of self-injury incidents and concerns This should include instances where referrals were or were not made to another agency such as children's social care or the Prevent program etc
- ensure the safeguarding file is transferred in accordance with requirements when the pupil leaves the school;
- liaise with the local authority and work with other agencies and professionals in line with Working Together to Safeguard Children;
- have a working knowledge of KRSCP and AfC procedures and will ensure that either they, or an appropriate staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments and provide a report, where required, which has usually been shared with the parents and child (depending on age and understanding);
- notify Children's Social Care if a child subject to a child protection plan is absent from school without explanation;
- ensure that all staff sign to say they have read, understood and agree to work within the school's safeguarding and child protection policy, staff code of conduct and Keeping Children Safe in Education Part 1 and Annex B; organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences;
- undertake, with the headteacher and Governing Board, an annual audit of the school's safeguarding policies, procedures and practices and ensure that this is submitted to KRSCP;

- uphold a close relationship with the KRSCP, such as through attendance KRSCP termly DSL forums;
- have an understanding of locally agreed processes for providing early help and intervention and support members of staff where Early Help is appropriate;
- liaise with the headteacher to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- be aware of the requirement for children to have an 'Appropriate Adult' to support and help them in the case of a police investigation or search. Further information can be found in the Statutory guidance - [PACE Code C 2019](#). The DSL is responsible for ensuring all staff are aware of this requirement;
- promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that pupils (including those with a social worker) are experiencing, or have experienced, with teachers and other staff, for example by supporting teaching staff to identify the challenges they may face, and the additional academic support and adjustments that they could make to best support them;
- understand the school's filtering and monitoring systems on school devices and networks and work with the trust's Technology Strategic Lead and IT support team to ensure they are effective and that the DSL receives the safeguarding alerts and related information and reports generated by those systems without delay

This list is not exhaustive: please see Annex C of Keeping Children Safe in Education. The full responsibilities of the DSL and Deputies are set out in their job description.

### **32.3. The Head teacher**

The Head teacher will ensure that:

- the safeguarding and child protection policy and related policies and procedures are implemented and followed by all staff;
- sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and Deputy(ies) to carry out their roles effectively;
- systems are in place for children to express their views and give feedback, which operate with the best interests of the child at heart;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing/managing allegations against staff procedures;
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online. The PSHE curriculum is reviewed regularly to ensure that it remains relevant and current;
- behaviour expectations around the whole school site will be consistent with the safeguarding and relationship lessons taught in the classroom;
- They liaise with the local authority designated officer (LADO) within 24 hours before taking any action, and then on an ongoing basis, where an allegation is made against a member of staff or a volunteer.

At Fern Hill Primary as an Early Years provider the Head teacher will also:

- Ensure the relevant staffing ratios are met, where applicable;

- Making sure each child in the Early Years Foundation Stage is assigned a key person.

### **32.4. The Trust Board:**

The board will:

- Facilitate a whole-trust approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - Online safety is a running and interrelated theme within the whole-trust approach to safeguarding and related policies
  - Appropriate filtering and monitoring systems are in place and their effectiveness is regularly reviewed
  - The Senior Leadership Team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
  - The trust has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Our separate Allegations and Low Level Concerns policy covers this procedure (a copy is available on the policy page of the school website)
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities on the school premises (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

All trustees and trust associates will read Keeping Children Safe in Education 2024 and sign to confirm this.

Section 31 has information on how trustees (and trust associates) are supported to fulfil their role through induction and ongoing training.

### 32.5. Local Academy Committees

The Local Academy Committees will review the school-specific elements of the policy after the trust level policy has been reviewed and approved.

They will appoint a member of each Committee to act as the trustee/trust associate responsible for safeguarding, to liaise with the school DSL on local safeguarding issues and report to the safeguarding trustee. The Committee will also hold the headteacher to account for the implementation of the policy.

### 33.Related Policies

We are aware that safeguarding is fundamental to the welfare of all pupils in our care. This policy is therefore one of a series in the school's integrated safeguarding portfolio and should be read in conjunction with the policies and other documents listed below (copies are available on the [Policy Page](#) on the school website):

- Allegations of Abuse and Low Level Concerns
- Anti-Bullying
- Attendance (including Children Missing Education)
- Behaviour
- Complaints
- Data Protection
- Equality Statement
- Health and Safety (including First Aid)
- Intimate care
- Lettings
- Online Safety
- SEND
- Staff Code of Conduct
- Safer Recruitment
- Relationships and Sex Education
- Whistle-Blowing

### 34.Monitoring and Review

- 34.1. All school staff (including temporary/agency staff and volunteers) and parents/carers have access to a copy of this policy, either via the Policy page of the [school website](#).
- 34.2. This policy will be reviewed annually by the Executive Director with the DSLs. At every review, it will be approved by the full board of trustees and the school specific sections then reviewed by the local academy committees.
- 34.3. All staff sign annually to the effect that they have read and understood the contents of this policy.
- 34.4. This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

- 34.5.** The DSL, Safeguarding Team and Head Teacher will review this policy as appropriate following any child protection or safeguarding breaches, concerns or 'near misses' in school or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice and procedures.
- 34.6.** A 'lessons learnt' meeting must be held following any serious child protection or safeguarding issue, attended by the DSL and Deputy DSLs, the Head Teacher and one of the named safeguarding trustees, to review the school's procedures and this policy and to make recommendations for amendments and additions in response to that issue.
- 34.7.** The implementation of this policy and our procedures will be monitored and evaluated by:
- Every 2-3 years an external audit and an annual audit of Fern Hill Primary School 's safeguarding policies, procedures and practices is undertaken with the Headteacher and DSL (DSL) and this is reported to the Board and submitted to KRSCP.
  - A termly report to the Local Academy Committee (to include a review of the Safeguarding Action Plan);
  - An annual report to the Trust Board detailing staff training and induction, safeguarding policies, external/internal audits and how the school is promoting safeguarding, safeguarding issues and any priorities identified going forward
  - trustee/trust associate visits to the school
  - SLT 'drop ins' and discussions with children and staff
  - pupil surveys and questionnaires
  - scrutiny of attendance data
  - scrutiny of a range of risk assessments
  - logs of bullying/behaviour incidents for the Senior Leadership Team and the Local Academy Committee to monitor
  - review of parental concerns and parent questionnaires
- 34.8.** The policy is reviewed annually (or sooner following any change in guidance or practice) by the Trust Board of Kingston Educational Trust and by a member of the Senior Leadership Team in consultation with the DSL and other staff with safeguarding and child protection expertise.

Approved by Kingston Educational Trust on 15 July 2024

Signed:

Graham Willett, Chair

[A signed copy is held by the Head of Governance]

Next review due: July 2025

### Appendix 1: Types of Abuse and Example Indicators

#### 1. Recognition: Types of Abuse, Exploitation and Neglect and Impact

1.1. **Introduction:** We recognise that because of the day-to-day contact with pupils, school staff are extremely well placed to observe outward signs of abuse.

1.2. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

However, abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

1.3. Child welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. Children may be abused in a family, in an institutional or community setting, by those known to them or by a stranger. They may be abused by an adult or adults, or by another child or children. Children may be abused via the internet by other children, family members or by unknown or in some cases unidentifiable individuals. In the case of honour based abuse, including forced marriage and female genital mutilation, children may be taken out of the country to be abused. An abused child may often experience more than one type of abuse, as well as other difficulties in their lives.

1.4. Abuse, exploitation, neglect and other traumatic adverse childhood experiences can happen over a period of time, but can also be a one-off event. They can have major long-term impacts on all aspects of a child's physical and mental health and wellbeing, development, behaviour and education.

1.5. The warning signs and symptoms of child abuse, exploitation and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

1.6. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the pupil and their family. It is important to recognise that a warning sign doesn't automatically mean a pupil is being abused and individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

1.7. **Recognising abuse:** The following definitions have been adapted from the statutory guidance 'Keeping Children Safe in Education' and [Working Together to Safeguard Children](#) (2023)

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of

witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Abuse** against children and young people is broadly divided into four categories: Sexual Abuse, Physical Injury, Emotional Abuse and Neglect. Brief definitions and signs are given below:

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sex offenders have no common profile, and it is important to avoid attaching any significance to stereotypes around their background or behaviour.

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family. If a child makes an allegation of sexual abuse, it is very important that they are taken seriously. Allegations can often initially be indirect as the child tests the professional's response. Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional / behavioural.

#### **Signs that MAY INDICATE Sexual Abuse**

- Sudden changes in behaviour and school performance
- Conduct/ displays of affection which are sexual and age inappropriate
- Self-harm, eating disorder, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Unwillingness or fear of undressing, eg for PE (but this may be related to cultural norms or physical difficulties)
- Sleep disturbances or nightmares
- Phobias or panic attacks
- Pain or itching of genital area

- Injuries to the genital or anal areas, bruising to buttocks, abdomen and thighs
- Wetting or soiling
- Indiscriminate choice of sexual partners
- Sexually transmitted disease
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Fire setting

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. This situation is now known as illness fabricated or induced by carer (previously Munchausen Syndrome by Proxy).

**Signs that MAY INDICATE physical abuse**

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bilateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts, hand or hair brush prints)
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour of bruises possibly indicating injuries caused at different times
- A large number of scars or scars of different sizes or ages, or on different parts of the body
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts/self destructive tendencies/withdrawal from physical contact/fear of returning home.

Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment, or a reluctance to give information or mention previous injuries should signal concern, as well as family use of different doctors and A&E Departments.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the

ill-treatment of another (e.g. where there is domestic violence and abuse). It may involve serious bullying (including online/ cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### **Signs that MAY INDICATE emotional abuse**

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Fear of new situations
- Sudden speech disorders
- Self-harming
- Inappropriate responses to painful situations
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Abnormal attachment between a child and parent or no attachment
- Fear of parents being contacted
- Unwillingness or inability to play
- Withdrawn or seen as a 'loner' and difficulty relating to others
- Excessive need for approval, attention and affection
- Running away

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional, social and educational needs.

Children and young people with disabilities can be particularly vulnerable to neglect due to the increased level of care they may require. Although neglect can be perpetrated consciously as an abusive act by a parent, it is rarely an act of deliberate cruelty. Neglect is usually defined as an omission of care by the child's parent, often due to one or more unmet needs of their own. These could include domestic abuse, mental health issues, learning disabilities, substance misuse, or social isolation/exclusion. Neglect can occur in affluent families.

#### **Signs that MAY INDICATE neglect.**

- Constant hunger
- Poor personal hygiene
- Constant tiredness

- Inadequate clothing
- Frequent lateness or non-attendance at School
- Untreated medical or dental problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

### **1.8. Impact of abuse**

The sustained abuse or neglect of children physically, emotionally or sexually can have long term effects on the child's health, development and wellbeing. It is important to consider the impact on any siblings as well. It can impact significantly on a child's self-esteem, self-image and on their perception of self and of others. The more Adverse Childhood Experiences (ACEs) a child has, the more likely they are to suffer long term. The effects can extend into adult life and lead to difficulties in forming and sustaining positive and close relationships. In some situations, it can affect parenting ability.

**Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of 'it could happen here'.**

## Appendix 2: Specific Safeguarding Issues

(See also Annex B of *Keeping Children Safe in Education* [September 2024](#) which sets out information about specific forms of abuse and safeguarding issues).

### 1. Children who are Absent from or Missing Education

We recognise that full attendance at school is important to the wellbeing of all our pupils and enables them to access the opportunities made available to them at school.

All staff are aware that a child absent from education, particularly for prolonged periods and/or on repeat occasions is a potential indicator of abuse, neglect and exploitation, including sexual abuse and sexual exploitation and can also be a sign of child criminal exploitation, including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage and other harmful practices.

Attendance is monitored closely. We identify and monitor pupils who are persistently absent and we put in place tailored support to help to identify any abuse and to prevent the risk of them becoming a child missing education in the future. We work in partnership with AfC when patterns of absence give rise to concern.

We will ensure, where possible, that we have more than one emergency contact number for each pupil. This will give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

Our attendance policy is set out in a separate document and is reviewed regularly by the Local Academy Committee. The school operates in accordance with statutory guidance [Children missing education: statutory guidance for local authorities](#)

### 2. Children who run away or go missing from home or care

We recognise that children who run away or go missing - and are thus absent from their normal residence - are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm.

The statutory guidance [Children Who Run Away or go Missing from Home or Care](#) requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return. When necessary and in conjunction with AfC or other relevant local authority, we will facilitate return home interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space in school for the interview to take place.

### 3. Exploitation

Perpetrators may subject children to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Whilst age can contribute to an imbalance of power, there are a range of factors can make a child more vulnerable to exploitation, including:

- sexual identity,

- cognitive ability,
- learning difficulties,
- communication ability,
- physical strength, status, and
- access to economic or other resources.

### 3.1. Child Sexual Exploitation (CSE)

We follow the London Child Protection Procedures for safeguarding children from sexual exploitation. [Safeguarding Children from Sexual Exploitation](#)

In February 2017, the government updated the working definition of child sexual exploitation [Child sexual exploitation definition and guide](#)

“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.”

Child sexual exploitation is a form of child sexual abuse affecting boys and girls. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

Child sexual exploitation may occur without the child being aware of events, or understanding that these constitute abuse.

Child sexual exploitation is never the victim’s fault, even if there is some form of exchange: all children and young people under the age of 18 have a right to be safe and should be protected from harm.

#### **Child sexual exploitation:**

- can affect any child or young person (male or female) under the age of 18, including 16 and 17 year olds who can legally consent to have sex
- can still be abuse even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child’s or young person’s immediate knowledge (through others copying videos or images they have created and posting on social media, for example)

- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse. While age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, or access to economic or other resources

### **Consent**

Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation), consent cannot legally be given whatever the age of the child.

### **Key factors in child sexual exploitation**

Child sexual exploitation involves some form of exchange (sexual activity in return for something) between the victim and/or perpetrator or facilitator. Where there is no such exchange, for example, where the gain for the perpetrator is sexual gratification (or the exercise of power or control), this is described as sexual abuse (and not exploitation).

The exchange can include both tangible (such as money, drugs or alcohol) and intangible rewards (such as status, protection or perceived receipt of love or affection). The receipt of something by a child/young person does not make them any less of a victim.

It is also important to note that the prevention of something negative can also fulfil the definition of exchange, for example a child who engages in sexual activity to stop someone carrying out a threat to harm his/her family.

### **Links to other kinds of crime:**

- Child trafficking and modern slavery
- Domestic abuse
- Sexual violence in intimate relationships
- Grooming (including online grooming)
- Abusive images of children and their distribution
- Drugs-related offences
- Gang-related activity
- Immigration-related offences
- Domestic servitude

### **Potential vulnerabilities**

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

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe or stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality for example)
- Recent bereavement or loss

- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity

Possible indicators of child sexual exploitation:

- Acquisition of money, clothes, mobile phones etc, without plausible explanation
- Gang association and/or isolation from peers and social networks
- Exclusion or unexplained absences from school
- Leaving home or care without explanation and persistently going missing or returning late
- Excessive receipt of texts or phone calls
- Returning home under the influence of drugs or alcohol
- Inappropriate sexualised behaviour for age or sexually transmitted infections
- Evidence of or suspicion of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or children)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional wellbeing
- Online exploitation

All young people are at risk from online exploitation and can be unaware that this is happening. Online exploitation includes the exchange of sexual communication or images and can be particularly challenging to identify and respond to. Children, young people and perpetrators are frequently more familiar with, and spend more time in, these environments than their parents and carers.

Online child sexual exploitation allows perpetrators to initiate contact with multiple potential victims and offers a perception of anonymity. Where exploitation does occur online, the transfer of images can be quickly and easily shared with others, which makes it difficult to contain the potential for further abuse.

It must be recognised that children may also be instigators of abuse, sometimes at the same time as being abused themselves.

### **3.2. Child Criminal Exploitation (CCE)**

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact, it can also occur through the use of technology. CCE can include children being:

- forced to work in cannabis factories
- coerced into moving drugs or money across the country (county lines)
- forced to shoplift or pickpocket
- forced to threaten other young people
- manipulated into committing vehicle crime

Some of the following can be indicators of CCE:

- unexplained gifts or new possessions
- association with other young people involved in exploitation
- changes in emotional wellbeing
- misuse of drugs and alcohol
- regular missing episodes or frequently coming home late
- missing school or education

### **3.3. County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of 'deal line'. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools, and pupil referral units. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Key to identifying potential involvement in county lines are missing episodes, other potential indicators are listed below:

- persistently going missing from school or home and / or being found out-of-area/ in accommodation that they have no connection with, or in a hotel room where there is drug activity;
- have been the victim or perpetrator of serious violence (eg knife crime)
- unexplained acquisition of money, clothes, or mobile phones
- involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- excessive receipt of texts / phone calls and/or having multiple handsets
- owing a 'debt bond' to their exploiters;
- having their bank accounts used to facilitate drug dealing
- relationships with controlling / older individuals or groups
- leaving home / care without explanation
- suspicion of physical assault / unexplained injuries

- parental concerns
- carrying weapons
- significant decline in school results / performance
- gang association or isolation from peers or social networks
- self-harm or significant changes in emotional well-being

Like other forms of abuse and exploitation, county lines exploitation:

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

For more information see: [Criminal exploitation of children and vulnerable adults: county lines](#)

#### 4. Serious youth violence

Staff are aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school,
- a change in friendships or relationships with older individuals or groups,
- a significant decline in performance,
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- unexplained gifts or new possessions.

Risk factors which increase the likelihood of involvement in serious violence are:

- being male,
- having been frequently absent or permanently excluded from school,
- having experienced child maltreatment and
- having been involved in offending, such as theft or robbery

For more information see: [Preventing youth violence and gang involvement](#)

#### 5. School-related weapons incidents

We have a duty and a responsibility to protect and safeguard our pupils and staff and will inform SPA and the police of any incident involving a weapon or potential weapon. We follow the AfC School Related Weapons or Potential Weapons Incidents Protocol.

Teachers have a number of legal powers, which include the power to search pupils without consent for a number of 'prohibited items'. These include knives and weapons; alcohol; illegal drugs and stolen items; tobacco and cigarette papers; fireworks; pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, cause personal injury or damage to property; and any item banned by the school rules that has been identified in these rules as an item that may be searched for [Searching, screening and confiscation](#)

We recognise that children and young people involved in school-related weapons incidents, including the person displaying the behaviour, are vulnerable and will provide support, protection and education to develop a full understanding of the implications of carrying, and/or using, weapons.

## **6. Child trafficking and modern slavery**

Human trafficking, is defined in the UN Protocol on trafficking, adopted in 2000, as the acquisition of a person, by means of deception or coercion, for the purposes of exploitation. Human trafficking, or modern slavery as it is often referred to, is a crime and a safeguarding issue affecting millions across the world and in the United Kingdom.

Staff are alert to the existence of modern slavery and child trafficking and concerns will be recorded and reported to SPA as appropriate.

### **6.1. Types of Modern Slavery**

Examples of industries and services where slavery exist in the UK today, the victims of which include children and young people are:

- the sex industry, including brothels
- retail: nail bars, hand car washes
- factories: food packing
- hospitality: fast-food outlets
- agriculture: fruit picking
- domestic labour: cooking, cleaning and childminding

In addition, victims can be forced into criminal activities such as cannabis production, theft or begging.

Modern slavery is an issue that transcends age, gender and ethnicities. It can include victims that have been brought to the UK from overseas or vulnerable people in the UK being forced illegally to work against their will. Children and young people have an increased vulnerability to slavery.

Poverty, limited opportunities at home, lack of education, unstable social and political conditions and war are some of the situations that contribute to trafficking of victims and slavery.

Slavery can be linked to a number of safeguarding issues, including child sexual exploitation, but normally includes at least one of the following specific situations:

- Child trafficking: young people being moved internationally or domestically so that they can be exploited.
- Forced labour: victims are forced to work through physical or mental threat, against their will, often for very long hours for little or no pay, in conditions that can affect their physical and mental health. They are often subjected to verbal or physical threats of violence against them as individuals or their families.

- Debt bondage: victims forced to work to pay off debts that they will never be able to. Debts can be passed down to children. Extreme examples include where a victim may be owned or controlled by an 'employer' or sold as a commodity.

Possible signs and indicators that someone is a victim of modern slavery that anyone working with children and young people should be aware of include:

- physical appearance: poor physical condition, malnourishment, untreated injuries and looking neglected;
- isolation: victims may not be allowed out on their own and may appear to be under the control or influence of people accompanying them, with the absence of a parent or legal guardian. They may not interact and be unfamiliar in their local community;
- poor living conditions: victims may be living in dirty, cramped or overcrowded accommodation, with multiple children living and working at the same address or premises;
- personal belongings: few possessions, wearing the same clothes each day and no identification documents;
- restricted freedom: victims have little opportunity to move freely and may be kept from having access to their passport;
- unusual travel times: victims may be dropped off or collected from work on a regular basis either very early or late at night;
- reluctant to seek help: victims may avoid eye contact, appear frightened or hesitant to approach people and have lack of trust or concern about making a report should they be deported or fear of violence on their family.

If a member of staff suspects that a pupil may be a victim they will report their concerns to the DSL. The DSL will seek advice and support from SPA who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM).

Further advice can be provided directly by the modern slavery helpline on 0800 012 1700. For further information see: [Modern slavery: how to identify and support victims](#)

## **7. Contextual safeguarding and exploitation**

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

The focus of contextual safeguarding and exploitation is implementing child safeguarding practices into community spaces to ensure that children are protected from the harm they experience outside of the family home. This focus moves beyond just assessing parenting capacity to safeguard a child at home, to assessing the impact of peer groups and community spaces (schools and neighbourhoods) on a child's safety and wellbeing outside the home.

It looks to identify the influences outside the family that can impact the parent-child relationship and the safety of a child in the community. Examples of extra familial harms that children can be vulnerable to include county lines and sexual abuse.

We will maintain records of concerns about extrafamilial harm in the same way as other concerns are recorded and in accordance with our safeguarding procedures. Concerns relating to significant harm and extrafamilial harm will be referred by the DSL to the Single Point of Access Team, if considered appropriate, a multi-agency strategy meeting will be held to determine threshold for significant harm, as well as for the Multi Agency Pre-MACE Panel.

[Contextual safeguarding](#) [KRSCP guidance to MARVE](#) [KRSCP threshold](#) [Missing Protocol](#)

## 8. Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber-dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a pupil in this area, the DSL (or a deputy) will consider referring into the [Cyber Choices](#) programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety. Additional advice can be found at: [National Cyber Security Centre](#) [When to call the police](#)

## 9. Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

We recognise that exposure to domestic abuse 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.

The school has signed up to the police initiative Operation Encompass that helps the school to provide silent support to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in school before the child or children arrive at school the following day. This ensures that the school has up-to-date relevant information about the child's circumstances and can enable silent support to be given to the child according to their needs. [Operation Encompass](#)

#### **10. So-called 'honour based' abuse**

So-called 'honour based' abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Crimes include female genital mutilation (FGM), forced marriage and harmful practices such as breast ironing.

Honour based abuse might be committed against young people in our school who

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to avoid an arranged marriage
- want to avoid a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour in or justification for abusing the human rights of others. Staff will record and report any concerns about a child who might be at risk of HBA to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral to the police and/or the SPA as with any other child protection concern and may also contact the forced marriage unit for advice as necessary.

#### **11. Forced Marriage**

Forcing someone into a marriage is a crime in England and Wales. A forced marriage is a marriage in which one or both parties does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as to legal marriages.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014, forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. For further information see: [Guidance forced marriage Asian Women's Resource Centre](#)

School staff will never attempt to intervene directly as a school or through a third party. Concerns must be reported to the DSL and contact will be made with the Single Point of Access or the Forced Marriage Unit (020 7008 0151) for advice and support.

## **12. Homelessness**

We recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

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

- household debt, including new poverty induced by the pandemic
- rent arrears
- domestic abuse and antisocial behaviour
- the family being asked to leave a property

If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

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

We recognise that children who have a family member in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The school will work with agencies and resources such as [NICCO](#) to help mitigate negative consequences for those children.

## **14. Private fostering**

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. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts. It applies to children under the age of 16, or under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

We recognise that most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases. Therefore all staff are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify local authority children's social care as soon as possible. When the school becomes aware of a private fostering arrangement for a pupil that has not been notified to local authority children's social care, we will encourage parents and private foster carers to notify local authority children's social care themselves in the first

instance, but also alert them to our mandatory duty as a school to inform the local authority of children in such arrangements.

For further information see [Looking after someone else's child](#)

## 15. Self-Harm and Suicide

**Suicide:** an act of deliberate self-harm which results in death.

**Self-harm:** self-poisoning or self-injury, irrespective of the apparent purpose of the act.

**Suicide and self-harm links:** self-harm is generally a way of coping with overwhelming emotional distress. Many young people self-harm where there is no suicidal intent. However, research shows that young people who self-harm can be at a higher risk of suicide.

Self-harm is a coping mechanism that enables a person to express difficult emotions. Young people who hurt themselves often feel that physical pain is easier to deal with than the emotional pain they are experiencing, because it is tangible. But the behaviour only provides temporary relief and fails to deal with the underlying issues that a young person is facing. For some people, self-harm may last for a short time. For others, it can become a long-term problem. Some people self-harm, stop for a while, and return to it months, even years, later, in times of distress.

Risk factors that indicate a child or young person may be at risk of taking actions to harm themselves or attempt suicide can cover a wide range of life events such as bereavement; bullying; online bullying; mental health problems including eating disorders; family problems such as domestic violence; or any form of abuse or conflict between the child and parents.

The most common forms of self-harm are

- cutting
- biting self
- burning, scalding, branding
- picking at skin, reopening old wounds
- breaking bones, punching
- hair pulling
- head banging
- ingesting objects or toxic substances
- overdosing with a medicine

Self-harm is usually a secretive behaviour but signs may include:

- wearing long sleeves at inappropriate times
- spending more time in the bathroom
- unexplained cuts or bruises, burns or other injuries
- unexplained smell of Dettol, TCP, etc.
- low mood - seems to be depressed or unhappy, low self-esteem, feelings of worthlessness
- any mood changes - anger, sadness
- changes in eating or sleeping patterns
- losing friendships, spending more time by themselves and becoming more private or defensive
- withdrawal from activities that used to be enjoyed
- abuse of alcohol and/or drugs

We recognise that any pupil who self-harms or expresses thoughts about self-harm and/or suicide must be taken very seriously and appropriate help and intervention will be offered at the earliest point. Any member of staff who is made aware that a pupil has self-harmed, or is contemplating self-harm or suicide, will report the matter to the DSL immediately, as with any other safeguarding concern. A safety plan will be developed for any pupil at risk of suicide or self harm.

### **Cycle of Self-Harm.**

Inflicting pain produces endorphins. These are natural pain relievers and can give temporary relief from distress and emotional pain and induce a feeling of peace. This can become an addictive sensation which in turn makes it difficult to stop self-harm behaviour.

### **Management of the Contagion Effect**

Social contagion refers to the way in which behaviour like self-harm can spread among members of a group. The risk for contagion is increased when high-status or “popular” pupils are self-harming or when self-harm is used as a means for pupils to feel a sense of belonging to a particular group. Self-harm can also become an acceptable way of dealing with stress and anxiety within a friendship group. Staff who have been made aware that a pupil is self-harming must remain vigilant in case their peers are also self-harming.

To prevent social contagion in schools, staff should reduce communication around self-harm. If a pupil is self-harming, they should be advised not to explicitly talk with other pupils about engaging in self-harm. Staff should also help pupils manage scars and wounds and visible scars, wounds and cuts should be discouraged.

To reduce the risk of self harm pupils are educated about signs of distress in themselves and others, as well as the use of positive coping skills, as part of our programme of PSHE education which incorporates aspects of children’s emotional wellbeing and mental health.

The Samaritans report that recent research on suicide ‘contagion’ suggest that in young people especially, exposure to suicide can lead to increased risk of suicidal thoughts. Following the suicide or attempted suicide of any pupil, Teachers who know the pupils best should be alert to any pupils who are excessively upset or disturbed. These young people should be offered appropriate support or referral to specialist services without delay.

## **16. Fabricated or induced illnesses**

Staff are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child’s biological mother, exaggerates or deliberately causes symptoms of illness in the child.

There are many ways that the parent/carer may fabricate (make up or lie about) or induce illness in a child:

- lying about their child’s symptoms
- deliberately contaminating or manipulating clinical tests to fake evidence of illness. For example, by adding blood or glucose to urine samples, placing their blood on the child’s clothing to suggest unusual bleeding, or heating thermometers to suggest the presence of a fever
- poisoning their child with unsuitable and non-prescribed medicine
- infecting their child’s wounds or injecting the child with dirt or poo
- inducing unconsciousness by suffocating their child

- not treating or mistreating genuine conditions so they get worse
- withholding food, resulting in the child failing to develop physically and mentally at the expected rate.

The very presence of an illness can act as a stimulus to the abnormal behaviour and also provide the parent with opportunities for inducing symptoms.

Fabricated or induced illness is most commonly identified in younger children. Although some of these children die, there are many that do not die as a result of having their illness fabricated or induced, but who suffer significant long term physical or psychological health consequences.

Fabrication of illness may not necessarily result in a child experiencing physical harm, but there may be concerns about the child suffering emotional harm. They may suffer emotional harm and/or disturbed family relationships as a result of an abnormal relationship with their parent.

Staff will report any concerns about a child who might be experiencing fabricated or induced illness to the DSL as with any other safeguarding concern. The DSL will consider the need to make a referral or consult with the Single Point of Access as with any other child protection concern.

The Royal College of Paediatrics and Child Health (RCPCH) has issued updated guidance:

<https://childprotection.rcpch.ac.uk/resources/perplexing-presentations-and-fii/>

### Appendix 3: Links

**Children Act 1989 Care Planning, Placement and Case Review:**

[www.gov.uk/government/publications/children-act-1989-care-planning-placement-and-case-review](http://www.gov.uk/government/publications/children-act-1989-care-planning-placement-and-case-review)

**Children Act 2004:** [www.legislation.gov.uk/ukpga/2004/31/contents](http://www.legislation.gov.uk/ukpga/2004/31/contents)

**Education Act 2002:** [www.legislation.gov.uk/ukpga/2002/32/section/175](http://www.legislation.gov.uk/ukpga/2002/32/section/175)

**London Child Protection Procedures and Practice Guidance:** [www.londoncp.co.uk](http://www.londoncp.co.uk)

**Keeping Children Safe in Education 2024:**

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

**Working Together to Safeguard Children 2023:**

[www.gov.uk/government/publications/working-together-to-safeguard-children--2](http://www.gov.uk/government/publications/working-together-to-safeguard-children--2)

**Inspecting Safeguarding in Early Years, Education and Skills:** [Inspecting safeguarding in early years, education and skills - GOV.UK](https://www.gov.uk/government/publications/inspecting-safeguarding-in-early-years-education-and-skills)

**Teachers' Standards:** <https://www.gov.uk/government/publications/teachers-standards>

**What to do if You're Worried a Child is Being Abused:**

[www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2](http://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2)

**Information Sharing:**

[www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice](http://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice)

**Schools Covid-19 Operational guidance:**

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/schools-covid-19-operational-guidance>

**Statutory framework for the early years foundation stage:**

<https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

**Statutory guidance for alternative provision:** <https://www.gov.uk/government/publications/alternative-provision>

**Engaging Neglectful Parents from Affluent Backgrounds:**

<https://www.gold.ac.uk/media/documents-by-section/departments/social-therapeutic-and-comms-studies/Report--Neglect-in-Affluent-Families-1-December-2017.pdf>

**ACEs video:** <https://www.youtube.com/watch?v=XHgLYI9KZ-A>

**Mental health and behaviour in schools guidance:**

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

**NSPCC:** <https://www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/>

**Mind:** <https://www.mind.org.uk/>

**Kooth:** <https://www.kooth.com/>

**Domestic Abuse Act 2021:** <https://www.legislation.gov.uk/ukpga/2021/17/contents/enacted>

**Children Missing Education Statutory Guidance:**

<https://www.gov.uk/government/publications/children-missing-education>

**Stop it Now:**

<https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/>

**Child Sexual Exploitation Definition and Guide:**

[www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners](http://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners)

**Cyber Choices:** <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

**National Cyber Security Centre:** [National Cyber Security Centre](http://National Cyber Security Centre)

**Preventing youth violence and gang involvement:**

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

**Criminal exploitation of children and vulnerable adults: county lines:**

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

**Sharing nudes and semi-nudes: how to respond to an incident:**

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

**Searching, Screening and Confiscation:** [Searching, Screening and Confiscation - GOV.UK](http://Searching, Screening and Confiscation - GOV.UK)

**Female Genital Mutilation Statutory Guidance:**

[www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation](http://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation)

**Kingston and Richmond Safeguarding Children Partnership Female Genital Mutilation Policy:**

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/news-resources/policies-and-procedures-87/female-genital-mutilation-policy-203.ph>

**Guidance Forced Marriage:** [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)

**Asian Women's Resource Centre:** <https://www.asianwomenscentre.org.uk/>

**Modern slavery: how to identify and support victims:**

<https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

**Looking After Someone Else's Child:** [www.gov.uk/looking-after-someone-elses-child](http://www.gov.uk/looking-after-someone-elses-child)

**Protecting Children from Radicalisation: The Prevent Duty:**

[www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty](http://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty)

**Educate Against Hate:** [Educate against hate](http://Educate against hate)

**Papyrus:** <https://www.papyrus-uk.org/suicide-prevention/>

**RCPCH updated guidance on fabricated or induced illness:**

<https://childprotection.rcpch.ac.uk/resources/perplexing-presentations-and-fii/>

**Role and Responsibilities of the Designated Teacher:**

[www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/269764/role\\_and\\_responsibilities\\_of\\_the\\_designated\\_teacher\\_for\\_looked\\_after\\_children.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/269764/role_and_responsibilities_of_the_designated_teacher_for_looked_after_children.pdf)

**AfC Virtual School:** <https://www.afcvirtuelschool.org.uk/>

**Guidance for Safer Working Practice:**

<https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital>

**Criminal Exploitation of Children and Vulnerable Adults: County Lines:**

<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

**Teaching Online Safety:** <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

**Children who run away or go missing from home or care:**

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

**NSPCC Responding to a child's disclosure of abuse:** <https://www.youtube.com/watch?v=bvJ5uBIGYgE>

**SPA online referral form:**

[https://www.richmond.gov.uk/services/children\\_and\\_family\\_care/single\\_point\\_of\\_access/single\\_point\\_of\\_access\\_for\\_professionals](https://www.richmond.gov.uk/services/children_and_family_care/single_point_of_access/single_point_of_access_for_professionals)

**Positive environments where children can flourish:**

<https://www.gov.uk/government/publications/positive-environments-where-children-can-flourish/positive-environments-where-children-can-flourish>

**Use of reasonable force:** <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

## Appendix 4 -National Support Organisations

### Support for staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### Support for Children

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Kooth: [www.kooth.com](http://www.kooth.com) safe and anonymous online support for young people
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org) national UK charity dedicated to the **prevention** of young **suicide** and offers a helpline to give support, practical advice and information to any young person feeling suicidal or anyone who is concerned that a young person may be suicidal.
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk) Information on a range of subjects relevant to young people and their emotional health and wellbeing and a Helpline for parents
- The Mix: [www.themix.org.uk](http://www.themix.org.uk) support service for young people aged 13-25
- Calm Harm and Clear Fear - apps available on both iOS and Android supporting anxiety and thoughts of self harm

### Support for adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk) provides advice and support
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk) Provides help with bullying
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk) support for parents and carers of sexually abused children
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk) reporting centre for fraud and cyber crime

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### Domestic Abuse

- Kingston DV Hub:  
[https://www.kingston.gov.uk/info/200314/domestic\\_and\\_sexual\\_violence/929/get\\_help\\_from\\_domestic\\_or\\_sexual\\_violence](https://www.kingston.gov.uk/info/200314/domestic_and_sexual_violence/929/get_help_from_domestic_or_sexual_violence)
- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)

### **Honour based Abuse**

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

### **Sexual Abuse and Child Sexual Exploitation**

- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk/](http://www.iwf.org.uk/)

### **Online Safety**

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Childnet International: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
- ParentPort: [www.parentport.org.uk](http://www.parentport.org.uk)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)

### **Radicalisation and hate**

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)