



# TOWN CLOSE SCHOOL

NORWICH'S FINEST PREP SCHOOL • FOR GIRLS & BOYS • 3-13 YEARS

## **SAFEGUARDING POLICY INCORPORATING CHILD PROTECTION AND PREVENTION of EXTREMISM AND RADICALISATION. v.2.5**

**This policy applies to EYFS, Pre Prep and Prep children**

**Reviewed September 2021**

**Next review date September 2022**

**Policy reviewed by the Governors**

**November 2021**

**Planned date for next review by the Governors**

**November 2022**

Signed by Chair of Governors on

November 2021

**Should parents/carers have a concern about any aspect relating to Child Protection they should contact any of the Designated Safeguarding Leads**

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This policy is available to parents on request.

Parents may contact the following outside agencies for additional help and support:

OFSTED  
Royal Exchange Buildings  
St Ann's Square  
Manchester  
M2 7LA

Independent Schools Inspectorate  
CAP House  
9-12 Long Lane  
London  
EC1A 9H

## 1. CHILD PROTECTION – CONTACT LIST

### Designated Safeguarding Leads (DSL):

Mark Woods (01603 599026) [deputy@townclose.com](mailto:deputy@townclose.com)

Melanie Harries (01603 599008) [preprephead@townclose.com](mailto:preprephead@townclose.com)

### Deputy Designated Safeguarding Lead:

Sarah Laing (01603 599008) [preprepedep@townclose.com](mailto:preprepedep@townclose.com)

### Nominated teacher for Looked After Children and Previously Looked After Children

Emma Boyt (SENCo) (01603 620180) [eboyt@townclose.com](mailto:eboyt@townclose.com)

Chairman of Governors: Sarah Anthony [chairman@townclose.com](mailto:chairman@townclose.com)

Deputy Chairman of Governors: Susan Jack [deputychairman@townclose.com](mailto:deputychairman@townclose.com)

### Nominated Governor for Child Protection:

Sarah Waddington (contact via Town Close School 01603 620180)

### Headmaster:

Christopher Wilson (01603 620180) [head@townclose.com](mailto:head@townclose.com)

PDC Duty Desk (LADO): LADO team 01603 307797

Norfolk County Council Children's Advice and Duty Service (CADS) - for all concerns and referrals: 0344 800 8021

Norfolk Safeguarding Children Partnership

(01603 223409) / [www.norfolklscb.org](http://www.norfolklscb.org)

Safeguarding section of the Norfolk Schools website:  
[www.schools.norfolk.gov.uk/safeguarding](http://www.schools.norfolk.gov.uk/safeguarding)

NSPCC Whistleblowing Advice line: 0800 0280285

At all times Town Close School will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) and the Norfolk Multi Agency Safeguarding Partnership arrangements.

The School recognises that inter-agency working is essential if children are to receive effective targeted support as early as possible. We are therefore committed to initiating and supporting inter-agency work such as the:

- Family Support Process and Early Help
- CP Case Conferences, core groups and other multi-agency meetings
- Family Support Services
- Attendance at the Independent Schools' Safeguarding Forum
- Attendance at strategy meetings as required

## 2. INTRODUCTION

At Town Close School, we are committed to safeguarding children and young people.

Safeguarding and promoting the welfare of children is **everyone's** responsibility.

**Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. The term 'children' includes everyone under the age of 18. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. A vital part of the process of safeguarding children is teaching the children to recognise when they are at risk and how to get help when they need it.

It is the responsibility of every member of staff, volunteer and regular visitor to the School to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the pupils at this School. The School assess the risks and issues in the wider community, when considering the safety and wellbeing of its pupils.

The School accepts that safeguarding incidents could happen anywhere and therefore all staff should be alert to possible concerns being raised. If staff have any concerns about a child's welfare they should act on them immediately.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with the government publications: "Working Together to Safeguard Children" 2018, "What to do if you are worried a child is being abused" 2015. The guidance reflects 'Keeping Children Safe in Education' 2021.

The School takes seriously its responsibility to safeguard and promote the welfare of children, and to work together with other agencies to ensure adequate arrangements within our school to identify assess and support those children suffering harm.

The School recognises that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that a child's welfare is a paramount concern. The aim is therefore to provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

The School realises that all staff should listen to pupils and ensure that their feelings are taken into account and their views can be expressed whenever safeguarding concerns are raised and action is taken.

The School is fully committed to safeguarding and promoting the welfare of all its pupils. We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society. This policy sets out our strategies and procedures to protect vulnerable pupils from being radicalised or exposed to extremist views.

The key elements of our policy are prevention, protection and support.

### **3. THE AIMS OF THIS POLICY**

The School's main responsibility is the welfare of all children in its care, through prevention, protection and support. The School also aims to:

- Support the child's development in ways that will foster security, confidence and independence.
- Protect children at the School from maltreatment.
- Prevent impairment of the children's health or development.
- Ensure that children at the School grow up in circumstances consistent with the provision of safe and effective care.

- Provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to, approach adults if they are in difficulties, believing they will be effectively listened to.
- Raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse. Staff, students and volunteers are made aware that they MUST report any concern about inappropriate behaviour witnessed/suspected between a child/pupil at the School and an adult. They must also report any concerns about inappropriate behaviour between pupils.
- Provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the School, contribute to assessments of need and provide support packages for those children.
- Emphasise the need for good levels of communication between all members of staff.
- Develop a structured procedure within the school that will be followed by all members of the school community in cases of suspected abuse.
- Ensure that all staff working within the school have been interviewed and checked as to their suitability, have had their identity verified and appropriate checks made on their qualifications, references, medical fitness. They will also have been given clearance from the DBS. A single central record of these checks will be kept in line with statutory requirements.
- Ensure that all staff know of their responsibilities to disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the setting).
- Give clear guidelines to staff in a Code of Conduct so that they know how to identify unacceptable or suspicious behaviour
- Ensure that all staff, volunteers and governors have an understanding of what radicalisation and extremism is and why we need to be vigilant in school. Through training, staff, volunteers and governors will know what the school policy is on tackling extremism and radicalisation and how to respond when concerns arise. Warning Signs and Indicators of Concern to extremism can be found in Appendix iv of this policy.
- Assess the risks of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology.
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils.
- Parents/carers and pupils will know that the School has policies in place to keep pupils safe from harm and that the school regularly reviews these systems to ensure they are appropriate and effective.
- Give clear guidelines as to the use of staff mobiles and staff cameras.
- Play a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and know

the role the School plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

This policy applies to all pupils, staff, parents, governors, volunteers and visitors.

#### **4. INFORMATION SHARING AND CONFIDENTIALITY**

Confidentiality and data protection are important factors to consider and manage in all aspects of school life. It is crucial that information is handled correctly and safely when dealing with safeguarding and child protection issues, taking into account when, where and how information should be shared and with whom.

It is also vital, however, that protection of personal data and confidentiality do not prevent children from being protected: 'The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.' (KCSIE 2021).

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools have clear power to share, hold and use information for these purposes. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. A practitioner cannot be expected to gain consent if it is not possible to do so, or if doing so would place a child at risk.

#### **5. PROVIDING A SAFE ENVIRONMENT AT THE SCHOOL**

- The physical environment is kept as safe and secure as possible.
- Entry gates and doors are kept closed whenever possible and there are security locks on main entrances to the buildings. Electronic gates and barriers have been fitted around the site.
- All visitors to the site are required to register in and out of school and wear identity badges which also provide information about what to do if they have any safeguarding concerns.
- Parents visiting, delivering or collecting children are also required to wear identity badges.
- All members of staff wear identity badges whilst on the school premises during their working day. (Sports staff are provided with polo shirts, a fleece and a jacket with the school logo on to identify them).
- Staff follow registration procedures at the start of the day, the start of the afternoon, for all lessons (Prep Department only) and for any 'After School Care' or activity at the end of the day

## 6. THE ROLE OF THE CURRICULUM

Pupils are taught about safeguarding, including online, through various teaching and learning opportunities including RSE statutory guidance which has many areas which overlap the Safeguarding Policy. We follow a broad and balanced curriculum that reflects a safe ethos:

- Pupils learn how to use the internet safely. Throughout the curriculum, activities and opportunities are provided for children to develop the skills they need to identify risks and stay safe. Teaching pupils about how to stay safe and behave online, including identifying risks and how and when to seek support is crucial. Parents are also advised about how to keep their children safe on the internet at home.
- Pupils develop an awareness of school values, they are taught about their rights and accompanying duties and they learn what makes them feel safe and what action to take in an unsafe situation.
- Pupils learn to have confidence in the adults who are entrusted with their care.
- Staff develop quality relationships with our pupils that model and encourage the standards of behaviour expected.
- The School Rules and Code of Conduct, including the Town Close Way, are applied consistently, and appropriate sanctions are agreed and imposed accordingly to an agreed policy.
- Pupils are taught what to do if they are worried that they are being abused, and what to do if they are concerned about someone else being abused. This is part of the PHSE and RSE programme from Years 3-8 and delivered through the tutor group system for pupils from Years 5-8. In Pre Prep, Bird Family Meetings and PSHE and RSE curriculum address these issues, for example, via the NSPCC PANTS campaign.

A broad curriculum is in place to deliver the spiritual, moral, social and cultural development of pupils. Pupils will be encouraged to regard people of all faiths, races and cultures with respect and tolerance.

Through our curriculum we aim to:

- enable students to develop their self-knowledge, self-esteem and self-confidence;
- actively promote fundamental British values;
- enable students to distinguish right from wrong and to respect the civil and criminal law of England;
- encourage students to accept responsibility for their behaviour, show initiative, and to understand how they can contribute positively to the lives of those living and working in the locality of the school and to society more widely;
- enable students to acquire a broad general knowledge of and respect for public institutions and services in England;
- further tolerance and harmony between different cultural traditions by enabling students to acquire an appreciation of and respect for their own and other cultures;

- encourage respect for other people; and
- encourage respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in England.

### **Visiting Speakers**

At the School we recognise the role that external agencies and speakers can play in enhancing the learning experiences of our pupils. Where we use external agencies and individuals in this way, we will positively vet them to ensure that their messages are consistent with, and not in opposition to, the school's values and ethos.

The School will assess the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to pupils are consistent with the ethos of the School and do not marginalise any communities, groups or individuals;
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies;
- Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication;
- Activities are matched to the needs of pupils;
- Activities are carefully evaluated by the school to ensure that they are effective.

When staff invite speakers to come in to School to talk about pre-arranged topics they must discuss the programme in advance with them and have established the ground to be covered. As part of our safeguarding responsibilities and the Prevent Strategy, staff should research the person or organisation to establish whether they have demonstrated extremist views or actions in the past. If there are any doubts then staff should discuss them with one of the DSLs. It is essential that staff stay in the presentations or talks and that they are prepared to stop the proceedings immediately if anything occurs that puts the children at risk of radical or inappropriate opinions. A risk assessment must be completed and circulated to all staff before the speaker arrives. They must follow the normal procedure regarding signing in at the Front Office. Any guest speakers or external agencies will be provided with a copy of our safeguarding procedures on arrival at the school and will be appropriately supervised at all times.

## **7. EARLY HELP**

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan);
- Is a young carer;

- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/ goes missing from care or from home;
- Is misusing drugs or alcohol themselves;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Has returned home to their family from care;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child.

If early help is appropriate, the Designated Safeguarding Lead or deputy will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

## **8. WORKING WITH PARENTS AND CARERS**

The School's responsibility is to promote the protection and welfare of all children and the aim is to achieve this in partnership with the parents.

The Safeguarding and Child Protection Policy is available on the School's website and a copy can be provided to parents on request. Parents and carers are informed of the School's legal duty to assist colleagues in other agencies with child protection enquiries and what happens should there be cause to make a referral to Children's Advice and Duty Service (CADS). We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm. We will seek to share with parents any concerns we may have about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the School has about a child will not prevent the DSL making a referral to Children's Advice and Duty Service (CADS) in those circumstances where it is appropriate to do so.

In order to keep children safe and provide appropriate care for them, the School requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives
- Full names and contact details of all persons with parental responsibility (if different from above)

- Emergency contact details – preferably several
- Full details of any other adult authorised by the parent to collect the child from the School (if different from above)

The School will retain this information on the pupil file. The School will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the School has been supplied with the adult's full details in writing.

## **9. SAFER RECRUITMENT**

The School operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training. The School uses the recruitment and selection process to deter and reject unsuitable candidates. We require evidence of original academic certificates. We do not accept testimonials and take up references as soon as possible. All candidates have to complete application forms and any gaps in employment are thoroughly explored. The School undertakes Disclosure and Barring Service checks and uses any other means of ensuring that we are recruiting and selecting the most suitable people to work with the pupils. The level of DBS certificate required and whether a check for any prohibition, direction, sanction or restriction is required will depend on the role that is being offered and duties involved. For those engaged in management roles an additional check is undertaken to ensure that they are not prohibited under Section 128 provisions. (See Part Three of Keeping Children Safe in Education 2021). A Single Central Register is maintained.

## **RISK ASSESSMENTS FOR VOLUNTEERS**

The School should undertake a risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer. (See Part Three of Keeping Children Safe in Education 2021) Details of the risk assessment should be recorded.

## **STAFF OBLIGATIONS**

All staff in our School are required to notify the School immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare, have had a refusal or cancellation of registration relating to childcare (unless related to a failure to pay a prescribed fee under the 2006 act (regulation 4(1) of the 2018 regulations)) or being found to have committed an offence overseas, which would constitute an offence regarding disqualification under the 2018 regulations if it had been committed in any part of the United Kingdom.

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 apply to those providing early years childcare or later years childcare, including before school and after school clubs,

to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

Any staff member who is aware of anything that may affect his/her suitability to work with children must notify the School/their manager immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff who are disqualified from childcare or registration may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Headmaster for more details.

We recognise that it is a key role of the School to support children and that school may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

Staff acknowledge the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation.

**The School ensures that:**

- There is a Safeguarding and Child Protection policy together with a Code of Conduct and Handbook for Staff
- The School has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned
- There are two Designated Safeguarding Leads (DSLs) and one deputy who undertake interagency training and also an 'update' course every 2 years. They are as listed on the front page of this policy
- All other staff have Safeguarding training updated as appropriate.
- Any weaknesses in Child Protection are remedied immediately
- A named member of the Governing Body is nominated to liaise with the LA on Child Protection issues
- In the event of an allegation of abuse made against the Headmaster the Chair of Governors will liaise with the LA
- Child Protection policies and procedures are reviewed annually and that the Child Protection policy is available on the school website or by other means
- Enhanced DBS checks are in place for the Chair of Governors. All governors have been checked
- The senior members of staff who are involved in each recruitment will have completed safer recruitment training
- All members of staff and volunteers are provided with child protection awareness information at induction and the school safeguarding information leaflet so that they know who to discuss a concern with

- All members of staff are trained in and receive regular updates in e-safety and reporting concerns
- All staff have child protection awareness training, updated by the DSLs as appropriate, to maintain their understanding of the signs and indicators of abuse
- All members of staff and volunteers know how to respond to a pupil who discloses abuse
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Child Protection Policy, and reference to it in our Parents' Handbook
- We will ensure that child protection concerns or allegations against adults working in the school are referred to the LADO<sup>1</sup> for advice, and that any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service (DBS)<sup>2</sup> for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer
- All staff know that no child under the age of 16 years can give informed consent to sexual activity. The School will operate within the NSCP guidance with regard to the handling of such situations involving children under the age of 16 years.
- All staff are encouraged to listen to what children have to say and to give them space to do this safely.
- Our procedures are regularly reviewed and up-dated and staff are asked for input
- The names of the designated members of staff for Child Protection, the DSLs, are clearly advertised, along with their photos, in the school

All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned and this includes vulnerability to radicalisation. Opportunities are provided at staff meetings and informal meetings for staff to contribute to and shape safeguarding arrangements and child protection policy.

## **10. STAFF TRAINING AND INDUCTION**

All new staff, students and volunteers are given training in Safeguarding and Child Protection. The safeguarding response to children who go missing from education and the role of the Designated Safeguarding Leads and deputy and their identity are explained.

Induction training includes:

- Safeguarding and child protection policy, including the policy and procedures to deal with peer on-peer abuse and information about the identity and role of the DSL and any deputies.
- Staff are trained to manage a report of child-on-child sexual violence and sexual harassment

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<sup>1</sup>LADO Local Authority Designated Officer for allegations against staff. AEO Area Education Officer

<sup>2</sup> Contact the LADO for guidance in any case

- The staff code of conduct/behaviour policy including the whistleblowing procedure and the acceptable use of technologies policy.
- Pupil behaviour policy and Anti bullying policy.
- The school's safeguarding response to children who go missing from education (Procedure for children missing education policy)
- Online safety policy
- a copy of KCSIE, part 1 or Annex A if appropriate (Annex B for those who work directly with children).

Those staff who have direct contact with children are informed as to where to find, and must also read Annex B of *'Keeping Children Safe in Education 2021'*. This contains important additional information about specific forms of abuse and safeguarding issues. All staff receive regular training, at least annually, which is supplemented by informal updates as required, in staff meetings and e-mails. This helps staff to identify and report concerns such as:

- Significant changes in children's behaviour
- Symptoms of different kinds of abuse (see appendix i)
- Deterioration in children's general well-being
- Unexplained bruising, marks or signs of possible abuse or neglect
- Children's comments which give cause for concern
- Suspicions of neglect or abuse outside the setting (for example in the child's home life)
- Inappropriate behaviour displayed by members of staff, students or volunteers working with the children. (For example, inappropriate sexual comments, excessive one-to-one attention beyond the requirements of their usual role and responsibilities or inappropriate sharing of images.)
- Vulnerable children being radicalised to support terrorism and extremism. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

All training has regard to the Government's statutory guidance *'Working Together to Safeguard Children'* and *'Keeping Children Safe in Education'* DFE 2021. Concerns about a child's safety or welfare, are passed to the DSLs and, as appropriate, to the relevant agencies with statutory responsibilities (Children's Advice and Duty Service and, in emergencies, the police) without delay.

During training all staff are told that they are expected to disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the School).

All staff receive a copy of the most up-to-date version of 'Keeping Children Safe in Education: information for all school and college staff' and sign and return a form to say that they have read and understood it.

The School ensures that:

- It has designated members of staff (DSLs) who have undertaken the special, relevant training provided by the Safeguarding Advisor for Children's Advice and Duty Service (CADS), in Child Protection and update this every two years and their knowledge and skills are refreshed at regular intervals, at least annually.
- All members of staff including voluntary staff or students are, at the time of their induction, made aware of the School's policy for Safeguarding and Child Protection. They are informed about where to find the policy on-line. This training includes basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record and issues of confidentiality.
- All staff receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All members of temporary staff, volunteers, students and governors know how to respond to a pupil who discloses abuse.
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Child Protection Policy on request and reference to it in our introductory school pack.
- Using CPOMS to make a referral is explained and drawn to the attention of all staff, volunteers and students. It is used to record any concerns that are passed to the DSL.

All staff undertake appropriate Prevent training that equips them with the skills to identify and respond appropriately to concerns regarding extremism and radicalisation. Through training, we ensure that all of our staff are made fully aware of the threats, risks and vulnerabilities that are linked to radicalisation. Staff are able to identify children at risk of being drawn into extremism and develop the confidence to challenge extremist ideas. All staff understand how we can provide support to ensure that our pupils are resilient and supported to resist involvement in radical or extreme activities. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. The website below has been designed to equip schools and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people.

[www.educateagainsthate.com](http://www.educateagainsthate.com)

Teaching staff have regular online safety training and it is integrated, aligned and considered as part of the overarching safeguarding approach. Some useful links are listed below.

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

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

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

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

[www.pshe-association.org.uk](http://www.pshe-association.org.uk)

[www.educateagainsthate.com](http://www.educateagainsthate.com)

[www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation](http://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation)

## 11. DEFINITIONS OF ABUSE

**All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Types of abuse and neglect can be found in KCSIE 2021, Part 1.**

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

**Physical** abuse 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. It can also involve female genital mutilation sometimes carried out when the child/children go abroad on holiday but can also occur in the UK.

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

emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual** abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and **all** staff should be aware of it and of the school policy and procedures for dealing with it.

**Neglect** is the persistent failure to meet a child's basic physical and or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to; provide adequate food, clothing and shelter (including exclusion from home or abandonment); failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision (including the use of inadequate care-givers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **12. The Prevent Duty – the School's responsibilities**

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty' updated April 2021: <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalised, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Designated Safeguarding Lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

### Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

## **13. DEFINITIONS OF EXTREMISM AND RADICALISATION**

Children are vulnerable to extremist ideology and radicalisation.

**'Extremism'** is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

**'Non-violent extremism'** is extremism, as defined above, which is not accompanied by violence.

**'Prevention'** in the context of the Prevent duty means reducing or eliminating the risk of individuals becoming involved in terrorism. Prevent includes but is not confined to the identification and referral of those at risk of being drawn into terrorism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.

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

The current UK definition of **‘terrorism’** is given in the Terrorism Act 2000 (TACT 2000). In summary this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

**‘Terrorist-related offences’** are those (such as murder) which are not offences in terrorist legislation, but which are judged to be committed in relation to terrorism.

**‘Vulnerability’** describes the condition of being capable of being injured; difficult to defend; open to moral or ideological attack. Within Prevent, the word describes factors and characteristics associated with being susceptible to radicalisation.

#### **14. STAFF PROCEDURES IN THE EVENT OF SAFEGUARDING/RADICALISATION CONCERNS**

If any member of staff is concerned about a pupil they must inform a Designated Safeguarding Lead or deputy (Melanie Harries, Mark Woods or Sarah Laing). In case of serious harm, the Police will be informed from the outset.

**If a child is in immediate danger or is at risk of harm a referral should be made to children’s social care and/or the police immediately.** Anyone can make a referral. Where referrals are not made by the Designated Safeguarding Lead the Designated Safeguarding Lead should be informed, as soon as possible, that a referral has been made. The number for referrals to the CADs team is 0344 800 8020/1.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations and should be recorded using CPOMS, our online platform for recording all safeguarding concerns. Should access to the internet/a computer not be possible initially, staff can use the attached ‘Recording Form for Safeguarding Concerns’. When completing a CPOMS report or using the attached form, staff must ensure that they record the name of the child and the details of the observation, also the place where the observations were made, the date and time, recording only the facts. If recording what a child has said, staff should try and relate the exact words as they were spoken. The record should be very clear about why the adult has concerns about the child.

All staff may raise concerns directly with Norfolk County Council Children’s Advice and Duty Service (CADS).

Confidentiality must be maintained and information relating to individual pupils/families shared with staff on a strictly ‘need to know’ basis.

Any member of staff or visitor to the school who receives a disclosure of or suspects that a child is at risk of radicalisation must report it immediately to the Designated Safeguarding Lead or, if unavailable, to the alternate designated person. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

If any of these cannot be contacted, then the matter should be brought to the attention of Children's Advice and Duty Service (CADS) (0344 8008020).

Detailed information about the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 especially section 17 (children in need) and section 47 (a child suffering or likely to suffer, significant harm) that may follow a referral, along with the role staff might be expected to play in such an assessment can be found in Chapter 1 of 'Working together to safeguard children'. A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children suffering or likely to suffer significant harm – local authorities have a duty to make enquiries if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra familial threats like radicalisation and sexual exploitation.

## **ROLE OF THE LOCAL AUTHORITY**

The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. This will include determining whether:

- The child requires immediate protection and urgent action is required;
- Whether the child is in need, and should be assessed under section 17;
- There is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
- Any services are required by the child and family and what type of services;
- Further specialist assessments are required in order to help the local authority to decide what further action to take.

The referrer should follow up if this not forthcoming. If a statutory assessment is carried out, staff at Town Close School will do everything to support this process. If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

## **15. DEALING WITH AND RECORDING A DISCLOSURE**

A child may speak to a member of staff or volunteer because they feel that they will be listened to and they trust the adult. The staff member needs to listen to what the child has to say, and be very careful not to 'lead' the child or influence in any way what they say.

The adult must:

- Stay calm.
- Listen and be supportive.
- Not ask any leading questions, interrogate the child, put ideas in the child's head, or jump to conclusions.
- Never promise the child confidentiality.
- Explain that the information must be passed on to keep the child safe.
- Avoid criticising the alleged perpetrator.
- Tell the child what the adult has to do next. The Safeguarding process must be followed.
- Record what was said immediately if possible.
- Record what was said/heard/seen as accurately as possible.
- Record what was happening immediately before the child spoke to the adult. We have now moved to an online recording system for safeguarding concerns called CPOMS. Staff will be given an access code in order to enter information and concerns which will then be automatically forwarded to the DSLs.
- Use the attached 'body map' diagrams to indicate the position of any bruising or other injury. NB: Record statements and observations, rather than assumptions or interpretations.
- Recognise that significant harm can be 'actual' (that is happening now – bruises, injuries, neglect for example) or could be likely ( in the sense that unless action is taken now the child may be exposed to significant risk of harm in the future)
- Contact the DSL immediately.

See Appendix vi for a flowchart detailing 'Action where there are concerns' that outlines referral process.

If after a referral the child's situation does not appear to be improving the Designated Safeguarding Lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

## **16. MENTAL HEALTH AND POSSIBLE LINKS TO SAFEGUARDING AND CHILD PROTECTION**

Staff at Town Close School are aware that all children are potentially at risk of suffering from mental health problems. There are a number of potential triggers and these can occur at any time and, at first, may not appear significant. Staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering, abuse, neglect or exploitation.

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. NHS every mind matters gives examples such as:

- Significant changes in behaviour
- Ongoing difficulties sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Self-harm or neglecting themselves

If the school suspects a pupil has a mental health problem, a graduated response process (assess-plan-do-review) will be put in place.

The School has systems and processes in place for identifying possible mental health problems including: Pastoral support through tutor groups and classes (Prep)

- Class time, circle times and bird families (Pre Prep)
- Talk and Share and School Counsellor
- Prefects and house captains
- [help@townclose.com](mailto:help@townclose.com) email for pupils to make contact and posters with numbers such as Childline
- Staff share concerns over children in regular briefings and communications
- School Doctor

Where staff have a mental health concern about a child, they should raise the issue by informing the DSL or Deputy DSL by following our referral system. Once referral has been made to the DSL, they will decide whether and what type of escalation is required. This could be communication with parents, suggested referral to GP and/or Child and Adolescent mental health services (CAMHS). The DSL may inform the appropriate agency such as Early Help or CADS if appropriate. Accountability lies with the DSLs.

## **17. PEER ON PEER ABUSE - DEALING WITH ABUSE BY ONE OR MORE PUPILS AGAINST ANOTHER PUPIL, BULLYING**

All our staff are aware that children can abuse other children and that this is referred to as 'peer on peer abuse'. They know that this can happen both in and out of school and online.

The School aims to minimise risk of peer on peer abuse through:

- Adopting a zero tolerance approach to peer on peer abuse

- Staff and pupils knowing, and following, the Town Close Way which has care and respect at its heart
- Curriculum approach including Pastoral tutor plans, RSE, PSHE and computing
- Opportunities to talk with staff regarding issues through Talk and Share for example.
- Making use of Local and National support such as NSPCC and National Online Safety

It is important that staff:

- i) Recognise the indicators and signs of peer on peer abuse
- ii) Know how to identify it
- iii) Know how to respond to reports or disclosures of such abuse
- iv) Are aware that, even if there are no reports of such abuse, it may be happening
- v) Speak to the DSLs if they have any concerns regarding peer on peer abuse
- vi) Understand the importance of challenging inappropriate behaviours between peers.
- vii) Deal with/report any such concerns promptly to the DSL and record using CPOMS

Allegations of peer-on-peer abuse will be dealt with promptly, recorded in line with all safeguarding allegations and investigated by a DSL taking support from local safeguarding partners as appropriate.

Peer on peer abuse is most likely to include, but not limited to:

- bullying (including cyber, prejudice-based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- abuse in intimate personal relationships between peers
- Sexual violence and sexual harassment;
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence;
- Sharing nudes or semi-nudes (often referred to as sexting) which involves consensual and non-consensual sharing of nude and semi-nude images and/or videos
- Causing someone to engage in sexual activity without consent, such as causing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Initiation/hazing type violence and rituals.

If pupils have a concern, they can make a report by talking to a member staff of their choice either in person or via email. Pupils can contact [help@townclose.com](mailto:help@townclose.com) directly or can talk to parents and parents can contact class teachers, tutors or DSLs.

A zero tolerance approach is crucial in helping to minimise the risk of peer on peer abuse. Abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include children being sexually touched/assaulted or being subject to initiation-type violence. It is important to recognise that it is more likely for girls to be victims and boys to be perpetrators but that all peer-on-peer abuse is unacceptable and will be taken seriously.

All parties in bullying incidents are victims and all reports will be taken seriously. Ongoing support will be provided for victims, perpetrators, children and any other affected parties.

At Town Close School we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other students, in the school.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy.

Occasionally, allegations may be made against students by others in the School, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm', staff should follow the procedures below rather than the School's anti-bullying and Behaviour policies.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Norfolk Safeguarding Children Partnership (NSCP) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the Norfolk Safeguarding Children Partnership, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the Norfolk Safeguarding Children Partnership and/or the Police as appropriate.

## **18. SERIOUS VIOLENCE**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change of 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 could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

## **19. CONTEXTUAL SAFEGUARDING**

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside school. All staff should consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

## **20. CHILDREN WITH SPECIAL EDUCATIONAL NEEDS OR DISABILITIES (SEND) OR CERTAIN HEALTH CONDITIONS**

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying than other children);
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

To address these additional challenges, staff should consider extra pastoral support for children with SEND and disabilities, as well as support for communication, as appropriate. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSLs as appropriate.

## **21. SHARING NUDES OR SEMI-NUDES (previously known as 'Sexting')**

In the latest advice for schools and colleges (UKCIS, 2020), 'Sharing nudes or semi-nudes' is defined as the sending or posting of nude or semi-nude images, videos or live streams online, by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop, which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

This advice only covers the sharing of sexual imagery by young people. Creating and

sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks which need careful management. A young person is breaking the law if they take an explicit photo or video of themselves or a friend; share an explicit image or video of a child, even if it is shared between children of the same age; possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

In cases where nudes or semi-nudes have been shared, Town Close follows the guidance as shared by the UK Council for Internet Safety (UKCIS) December 2020:

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

In order to educate the pupils at Town Close on this topic, pupils undertake a range of activities, for example:

- a) Assemblies on SID (Safer Internet Day) with topics including the dangers and criminal implications of taking and sending such images
- b) Pupils create posters on internet safety.
- c) Year 7 pupils may look at and discuss the 'Consequences' film and Year 8 the 'Exposed'. Both of these are provided by CEOPS for use with KS3 children.

Information on the dangers of sharing nudes and semi-nudes (sexting) are sent out to parents along with links to the NSPCC "I saw your willy" campaign on this subject.

When an incident involving youth produced sexual imagery (sexting) comes to the School's attention:

- a) The incident should be referred to the DSL as soon as possible
- b) The DSL should hold an initial review meeting with appropriate school staff
- c) There should be subsequent interviews with the young people involved (if appropriate)
- d) Parents should 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
- e) At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to Children's Advice and Duty Service (CADS) and/or the Police immediately

Further information can be found on the NSPCC website

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/sexting-advice-professionals/>

## 22. CHILD SEXUAL EXPLOITATION (CSE)

The statutory definition of Child Sexual Exploitation (CSE) can be found in the guidance document *Child Sexual Exploitation: Definition and a guide for practitioners* (DfE 2017).

Child sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Staff should be aware of the key indicators of children being sexually exploited which can include:

- going missing for periods of time or regularly coming home late
- regularly missing school or education or not taking part in education
- concerning use of internet or other social media
- increasing secretiveness around behaviours
- appearing with money, gifts or new possessions without plausible explanation
- associating with other young people involved in exploitation
- having older boyfriends or girlfriends
- suffering from sexually transmitted infections
- self-harm, mood swings or changes in emotional wellbeing
- drug and alcohol misuse and
- displaying inappropriate sexualised behaviour for age
- gang association and/or isolation from peers/social networks

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child sexual exploitation:

### Inappropriate relationships:

Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

### Boyfriend/Girlfriend:

Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

### Organised exploitation and trafficking:

Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

(See Appendix i for further details)

### 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.

Vulnerabilities include:

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

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

## **23. CHILD CRIMINAL EXPLOITATION (CCE)**

Information about Child Criminal Exploitation (CCE) can be found in KCSIE (2021).

CCE 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/ (c) through violence or 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.

Some of the following can be indicators of CCE:

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

## **24. CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**

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

When referring to sexual violence the Sexual Offences Act 2003 describes the following offences:

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: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his 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: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Consent: Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline and in the context of child on child sexual harassment. 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 sexual environment. It can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual 'jokes' or taunting

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (could become sexual violence) and displaying pictures, photos or drawings of a sexual nature
- online sexual harassment. It may include non-consensual sharing of sexual images and videos; sexualised online bullying; unwanted sexual comments and messages including on social media
- sexual exploitation, coercion and threats

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

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will not be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or boys being boys
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks or normalising them

Staff should speak immediately to the DSLs about any concerns. Annual whole school safeguarding training includes how to manage a report of sexual violence and/or sexual harassment. The initial response to a report from a child is important and staff know to report concerns immediately to a DSL. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim be made to feel ashamed for making a report.

### **School's response to child on child sexual violence and/or sexual harassment**

The school will need to consider both the *immediate* response and the *ongoing* response.

In the event of a report of sexual violence and/or sexual harassment, as explained in KCSIE, there are four 'likely scenarios' for senior leaders to consider when managing the report.

- (i) Internal management
- (ii) Early Help
- (iii) Referrals to children social care
- (iv) Reporting to the police

*Immediate response:*

- responding,
- risk assessment,
- action following a report of sexual violence and or sexual harassment,
- options to manage the report considering bail options, the criminal process and unsubstantiated unfounded false or malicious reports

*Ongoing response*

- safeguarding and supporting the victim,
- ongoing considerations
- safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour.

## **25. SO-CALLED 'HONOUR-BASED' ABUSE**

So-called 'Honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect, or defend, the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

## **26. FORCED MARRIAGE**

Forcing a person into a marriage is a crime in England and Wales.

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties for example).

Further advice is available from the Forced Marriage Unit (Statutory guidance page 35 – 36). They can be contacted on 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk)

## **27. FEMALE GENITAL MUTILATION (FGM) and BREAST IRONING**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society

- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

### Symptoms of FGM

FGM may be likely if:

- there is a visiting female elder
- there is talk of a special procedure or celebration to become a woman
- parents wish to take their daughter out of school to visit an 'at-risk' country (especially before the summer holidays)
- parents' who wish to withdraw their children from learning about FGM.

Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 places a statutory duty on professionals (including teachers) to report to the police where they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure.

Teachers must personally report, to the police, cases where they discover that an active FGM appear to have been carried out and discuss any such cases with the DSL and children's social care. The duty does not apply in relation to at risk or suspected cases or in cases where a woman is 18 or over. In these cases, teachers should follow safeguarding procedures.

(See Appendix i for further details).

### **Breast ironing**

Breast ironing, also known as breast flattening, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop

developing or disappear. In the countries in which this happens (African countries, notably, Cameroon) girls, between 9 and 15 are at higher risk from this practice. The practice takes place because, once girls breasts have developed, they are at greater risk of sexual harassment, rape, forced marriage and kidnapping. Whilst this is not currently illegal, is considered a form of child abuse. If staff suspect a child may have undergone this practice or be at risk of doing so, they should act accordingly, following the School's procedures.

## **28. CHILDREN MISSING EDUCATION (CME)**

Knowing where children are during school hours is an extremely important aspect of safeguarding. All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and help prevent the risks of a child going missing in the future.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contact numbers for parents/carers. Parents should remember to update the school as soon as possible if their numbers change.

Further information can be found in CME; statutory guidance for local authorities – September 2016.

In response to the guidance in Keeping Children Safe in Education (2021) the School has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions), including notifying the Norfolk CME team when a child has been absent without the School's permission for a continuous period of 10 school days or more
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We ensure that pupils who are expected to attend the school, but fail to take up the place are referred to the local authority.

When a pupil leaves the school, we record the name of the pupil's new school (if known) and their expected start date. We complete a CME1 for every child who leaves the School unless they leave at the end of Year 6, as agreed with the Norfolk CME team.

## **29. PRIVATE FOSTERING**

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

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

Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children. The DSL should be informed so that they can notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. There is a duty for the school to inform the local authority but there is no duty for anyone, including the private foster carer or social worker, to inform the school. Private foster carers and parents both however, have a legal duty to inform the local authority of the arrangement, at least six weeks before it is due to start; it is a criminal offence not to do so. It should be clear to the school, however, who has parental responsibility. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

## **30. CHILDREN WHO HAVE A SOCIAL WORKER**

At Town Close School, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

## **31. LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN**

The most common reason for children becoming looked after (a child subjected to a care order or voluntarily accommodated by the local authority) is as a result of abuse

and/or neglect. The DSLs have responsibility for looked after children's welfare and educational achievement. They ensure that staff have the information required regarding legal status, contact and care arrangements. The DSLs have details of the child's social worker and the name of the virtual school head.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe.

### **32. CHILDREN AND THE COURT SYSTEM**

Children are sometimes required to give evidence in the criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5 – 11 years old and 12 – 17 years old. See Annex B, Keeping Children Safe in Education 2021.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service.

### **33. CHILDREN WITH FAMILY MEMBERS IN PRISON**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **34. COUNTY LINES**

County lines is the term used to describe gangs and organised criminal networks exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas using dedicated mobile phone lines or other forms of deal lines. 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 in victims. 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. See KCSIE 2021 p126.

## 35. DOMESTIC ABUSE

In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16 who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Town Close School (Head/DSLs) are registered with Operation Encompass, so the school is contacted if any of our children have been involved in/witness to domestic abuse.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse

affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[www.NSPCC.org.uk](http://www.NSPCC.org.uk) UK domestic-abuse signs and symptoms effects.

[www.refuge.org.uk](http://www.refuge.org.uk) What is domestic violence? Effects of domestic violence on children.

[www.safelives.org.uk](http://www.safelives.org.uk) Young people and domestic abuse.

### **36. HOMELESSNESS**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. See Annex B, Keeping Children Safe in Education 2021 for further information.

### **37. ALTERNATIVE PROVISION PROVIDERS**

Where the School places a pupil with an alternative provision provider, the School continues to be responsible for the safeguarding of that pupil, and should be satisfied that the provider meets the needs of the pupil. The School should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the School would otherwise perform in respect of its own staff.

### **38. CHILDREN STAYING WITH HOST FAMILIES (HOMESTAY)**

If arrangements are made for children to have learning experiences for short periods with care and accommodation provided by unrelated host families please refer to Annex E, KCSIE 2021.

### **39. RESPONSIBILITIES OF DSLs**

The DSLs and Deputy DSL are the most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSLs are all members of the Senior Management Team. They are responsible for:

- Communicating regularly with the local safeguarding agency whenever an allegation or disclosure of abuse has been made
- Referring a child if there are concerns about possible abuse, to the relevant authorities, and acting as a focal point for staff to discuss concerns. Any referral must be made within 24 hours of a disclosure or suspicion of abuse by calling CADS on 0344 800 8020. CADS is made up of senior social workers who will

provide advice and support and ask key questions about the risks and strengths within families. A plan is then made as to further action and the social worker will provide a written account of the discussion and advice.

- Keeping written records of concerns about a child even if there is no need to make an immediate referral. These files will include a chronology, contents front cover and records significant events in the child's life.
- Ensuring that all such records are kept confidentially and securely and are separate from pupil records
- Ensuring that an indication of the existence of the additional file is marked on the pupil's record
- When a child leaves Town Close School, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded, ensuring safe transit, to the receiving school in an appropriately agreed manner. Confirmation of receipt is obtained and evidence is kept as to how the file has been transferred.
- When a child arrives at Town Close School, their previous setting is contacted by letter and asked to confirm that they either have no concerns or that any existing child protection records are forwarded to Town Close School. Responses are strictly monitored.
- Where a parent elects to remove their child from the School to home educate, the DSL will make arrangements to pass any safeguarding concerns to the CME team within Norfolk County Council.
- Liaising with other agencies and professionals
- Organising child protection induction, and updating training regularly, for all school staff
- Oversee Online safety for the school community, including updating staff, parents and pupils with current issues, in conjunction with Head of Computing. Ensuring staff and pupils follow code of conduct and safer usage guidance
- Ensuring that there is a named Governor responsible for Child Protection, who will monitor the efficiency with which Child Protection duties have been carried out in the School
- Preparing any reports required using the 'guidance and education report template' provided by Children's Advice and Duty Service (CADS). The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at school. In order to complete such reports, all relevant information will be sought from staff working with the child in school
- Attending child protection conferences
- Organising their own re-training, provided by the Safeguarding Officer for Children's Advice and Duty Service (CADS), at least every 2 years so that they can continue in post, meet their responsibilities and carry out their duties
- Ensuring that any pupil currently with a child protection plan who is absent from school without explanation for two days is referred to their key worker's Social Care Team
- Preparing a safeguarding report for the governors recording training and any

safeguarding activity that has taken place such as meetings attended or reports written. These reports will not identify individual pupils.

- Working with the Headmaster to assess the risk of pupils being drawn into extremist views. The risk assessment may include consideration of the school's curriculum, the use of school premises by external agencies and any other local issues relating to the school community.
- Ensuring that appropriate safeguarding arrangements are in place by working in partnership with other agencies and communities as required.
- Providing out of school cover for safeguarding issues, via mobile phones.
- Acting as the point of contact within our school for any concerns relating to radicalisation and extremism.
- Making referrals in accordance with Norfolk Channel procedures to the CADS Team where appropriate and will represent the School at Channel meetings as required.
- Ensuring that all staff members and volunteers are aware of our policy and the procedures they need to follow. They will ensure that all staff have received appropriate training.
- Following receipt of any information raising concern about vulnerability to radicalisation, the DSL will consider what action to take and will follow the Norfolk Channel procedures by making a referral via the CADS as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.
- All Channel referrals will be made using the referral form that can be found at Appendix vii.
- Liaise with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (as per part four of *'Keeping Children Safe in Education'* 2021) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Refer cases where a crime has been committed to the Police.
- Monitor children where concerns have been raised and gather feedback from the children as appropriate.
- Being aware of children who have a social worker.
- Help promote educational outcomes by sharing the information about welfare, safeguarding and child protection issues with teachers and school leadership staff.

Full details of the DSLs' role can be found in Annex C, of *'Keeping Children Safe in Education'* (KCSIE 2021).

#### **40. EARLY YEARS FOUNDATION STAGE SAFEGUARDING**

The responsibility for safeguarding children within the Early Years Foundation Stage is designated to Head of the Pre Prep Department, Melanie Harries. She is one of the DSLs and will liaise with the local statutory children's agencies as appropriate. In her absence, this responsibility lies with Sarah Laing (Deputy DSL), and Deputy of the Prep Department, Mark Woods (DSL).

All staff and volunteers employed in our EYFS classes have clearance from the DBS in place before they are allowed unsupervised access to children in the School. They are told that they are expected to disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the setting). Any adult working on the premises without a full criminal records check will be supervised at all times.

#### **41. SAFE HANDLING OF CHILDREN** (See Use of Reasonable Force Policy for more details.)

Occasionally it may be necessary for staff to restrain pupils and to use reasonable force, whether children/pupils are on the school premises or on an authorised visit. This cause of action is only an acceptable in the following circumstances:

- where a criminal offence is being committed
- where pupils may injure themselves or others
- where the behaviour is prejudicial to maintaining good order and discipline at the School or among the pupils
- where pupils may cause personal injury or damage to property
- where the behaviour is disrupting the learning environment

Force must never be used as a punishment and only *minimum* force should be used.

#### **42. ARRANGEMENTS FOR HANDLING ALLEGATIONS OF ABUSE (AGAINST VOLUNTEERS, MEMBERS OF STAFF, THE HEADMASTER OR DESIGNATED SAFEGUARDING LEADS AND DEPUTY) AND THE ROLE OF THE LOCAL AUTHORITY DESIGNATED OFFICER (LADO)**

##### **Allegation against a staff member and volunteers**

Allegations against staff, volunteers or the Designated Safeguarding Leads or Deputy with responsibility for safeguarding should be reported to the Headmaster. This also applies to any allegations or information received that an adult may be unsuitable to work with children because of concerns relating to extremism and radicalisation. If the Head is absent, the allegation should be passed to the Chair of Governors. If the Chair of Governors is unavailable then the allegation should be passed to the Deputy Chair of Governors. Staff may consider discussing any concerns about another colleague with the DSLs and make any referral via them.

The School's aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for the children at our school. The School recognises that sometimes the behaviour of adults may lead to an allegation of abuse being made. Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned.

The School will always ensure that the Norfolk Safeguarding Children Partnership protocol and Part 4 of 'Keeping Children Safe in Education (DFE 2021) are adhered to. This guidance should be followed where it is alleged that anyone working in the school, including supply teachers and volunteers has:

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

This checklist is known as the 'harm test'.

In such an instance, the school will seek appropriate advice from the Local Authority Designated Officer (LADO). Initial contact should be to the PDC Duty Desk on **01603 307797**. The School will be able to speak to the Duty Adviser who will listen to the concerns and ask relevant questions. He/she will then advise about next steps. These may include advice on procedures in school or the recommendation to complete the electronic LADO consultation form.

It is intended that this is a triage system that will allow the School to speak to someone quickly rather than having to rely initially on an electronic system.

If an allegation is made, or information is received which suggests that a member of staff or volunteer may be unsuitable to work with children, then the matter will immediately be taken to the Headmaster. If an allegation is made against a member of staff the quick resolution of that allegation should be a clear priority to the benefit of all concerned. Any unnecessary delays should be eradicated.

The Headmaster will immediately (within one working day) discuss the allegation with the PDC Duty Desk in order to consider the nature, content, and context of an allegation and agree a course of action. An individual should be suspended only if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons. Where it has been deemed appropriate to suspend the person, written confirmation will be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. The person will be informed at the point of their suspension who their named contact is within the School and provided with their contact details. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO. The School will make every effort to maintain

confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegations, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused and a copy provided to the person concerned. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Headmaster will consider whether any disciplinary action is appropriate against a pupil who made it, or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

If there is a conflict of interest in reporting an allegation against a member of staff to the Head, the report can be made directly to the LADO under the guidance of the DSLs.

Allegations against a teacher who is no longer teaching should be referred to the Police.

The School has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or there is reason to believe that the individual has committed a listed relevant offence; and that the individual has been removed for working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person, following the Guidance on Referrals to DBS on GOV.UK. In the case of a member of the teaching staff the School will take advice from the LADO as to whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

### **Allegations Against the Head**

If the allegation concerns the Head, the person receiving the information will immediately inform the Chairman of Governors, Mrs Sarah Anthony, [chairman@townclose.com](mailto:chairman@townclose.com), without notifying the Head first.

If the Chairman of Governors is unavailable, then contact should be made with the Deputy Chairman of Governors, Susan Jack: [deputychair@townclose.com](mailto:deputychair@townclose.com)

The Chairman of Governors will seek advice from the LADO within one working day.

### **43. LOW LEVEL CONCERNS ABOUT STAFF BEHAVIOUR**

**This refers to allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors**

At Town Close School, we recognise the possibility that adults working in the school, including governors, volunteers, supply teachers, agency staff and contractors may harm children. Any concerns about the conduct of other adults in the school should be taken to the Headmaster without delay; any concerns about the Headmaster should go to the Chair of Governors who can be contacted by email (see the contact list on page 3 of this policy).

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Headmaster has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

### **Allegations**

It is an allegation if the person\* has:

- 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 he or she 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 (also includes behaviour outside the school).

(\*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'. They will be able to advise whether or not the incident meets the threshold for a referral to LADO and will be able to guide schools on the process to follow.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

### **Low-level Concerns**

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person\* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

This information is made clear in our School Code of Conduct, including the importance of sharing such concerns.

If the concern has been raised via a third party, the Headmaster should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name\* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

#### **44. WHISTLEBLOWING**

Each member of staff, student or volunteer, has a responsibility for raising concerns about unacceptable practice or behaviour in order to:

- prevent the problem worsening or widening
- protect or reduce risks to others
- prevent becoming implicated themselves

The School will respect the confidentiality of staff raising concerns and will maintain confidentiality so far as is consistent with taking the issues forward effectively. This procedure also allows you to raise concerns outside the normal line management structure where necessary. Although it can be difficult to bring matters of concern to the attention of others, it is particularly important where the welfare of children may be at risk.

Any individual may be the first to recognise that something is wrong but may not feel able to express their concerns out of a feeling that this would be disloyal to colleagues or they may fear harassment or victimisation. The advice given is that they should not consider '*What if I am wrong?*', but think '*What if I am correct?*'

This Whistle Blowing Procedure is to enable members of staff and volunteers to express any \*legitimate concern they have regarding suspected malpractice within the School. Where a staff member feels unable to raise an issue with the School or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found online - Advice on whistleblowing
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

## **Confidentiality**

Members of staff who wish to raise a concern under this procedure will not have their name disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate in order to preserve confidentiality that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will be informed in all cases.

Staff should be concerned about a member of staff if they:

- Disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children (whether received before or during their employment at the setting).
- Make use of their mobile phones or cameras inappropriately and in ways that are contrary to the School's policy on their use.
- Observe unacceptable ways of touching, or comforting or assisting children.

- Observe unacceptable force when restraining a child.
- Observe a member of staff alone with a child in a secluded area of the School. (We have an open door policy at Town Close and all classrooms have windows, so that they can be viewed from outside the room).
- Witness any inappropriate messages sent by text, email etc.
- Become aware of a member of staff having a close relationship with children's families, which may cause issues for the child involved.
- Observe a member of staff showing favouritism towards a child.
- Generally observe any incident or receive any information which, to them, seems to indicate a relationship between a member of staff and a pupil which goes beyond that which is to be expected.

If volunteers are working with children alone they should be, wherever possible, visible to other members of staff. They are expected to inform another member of staff of their whereabouts in school, who they are with and for how long.

A copy of the Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (2019) is available to staff on request.

Members of staff are expected to work in accordance with the standards laid out in this document.

Guidance for staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to pupils can be found in the relevant Staff Handbook.

Where there are concerns about the way that safeguarding is carried out in the school, staff should also refer to the Whistle-blowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

**Failure to adhere to these standards could result in disciplinary proceedings.**

## **45. USE OF MOBILE PHONES AND CAMERAS**

- Staff must not use their own mobile phones whilst supervising or teaching the children, unless in an emergency or special circumstances. If they need to receive or make a call from their mobile, then they should inform their colleagues and ensure that they are not in close proximity to children or within hearing distance of children when using the phone. Staff should not give their personal mobile phone numbers to pupils, nor should they communicate with pupils by text message
- EYFS or any other member of staff must not take photographs of the children on their own personal devices
- School cameras and iPhones are available and staff must use those, or their school iPad, rather than personal devices, when photographing children undertaking activities, in school or off site on a school trip. They are made aware that there may be spot checks on their devices
- The Group Leader on all trips and visits involving an overnight stay should take a School mobile phone with him/her
- The School mobile should be used for any contact with pupils that may be necessary
- If members of staff need to speak to a pupil by telephone, they should use one of the School's telephones

## **46. USE OF E-MAIL AND SOCIAL NETWORKING SITES**

(See TCH email acceptable use and TCH ICT acceptable user policies for more details.)

- Staff should not communicate with pupils or parents via personal email
- If email communication occurs, the individual's school email address should be used
- Staff using social networks for personal purposes should ensure that they do so in a way that avoids social contact with pupils or personal details being in the public domain. Staff should not allow current pupils or past pupils who still have siblings at Town Close access to personal pages
- There are systems in place for keeping pupils safe from extremist material when accessing the internet in our school by using effective filtering and usage policies.
- Any pupil who brings a mobile phone into School, must hand it in to the Front Office staff on arrival and can collect it at the end of the day. Children are not allowed to use mobile phones, or use or wear any other device which can connect to the internet, other than their School iPad.

## **47. ONLINE SAFETY**

The DSLs oversee online safety in conjunction with head of computing. The use of technology has become a significant component of many safeguarding issues. These have been categorised into three areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material; eg pornography, fake news, racist or radical and extremist views;
- **Contact:** being subjected to harmful online interaction with other users; eg commercial advertising as well as adults posing as children or young adults;
- **Conduct:** personal online behaviour that increases the likelihood or, of causes, harm; eg making, sending and receiving explicit images or online bullying.

The DfE has produced ‘Teaching online safety in school’ outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements.

The School has policies in place (see above) and filters to minimise the risk of children accessing inappropriate information or sites on their School devices. No personal devices are allowed to be worn or used in School or on School trips. Town Close School has produced an addendum to this policy (in light of COVID-19) which sets out the safeguarding for children accessing remote learning.

The following list is a useful starting point for staff and parents to help keep children safe online:

Organisation/resource	What it does/provides
<a href="https://www.thinkuknow.co.uk/">https://www.thinkuknow.co.uk/</a>	NCA CEOPS advice on online safety
<a href="https://www.disrespectnobody.co.uk/">https://www.disrespectnobody.co.uk/</a>	Home Office advice on healthy relationships, including sexting and pornography
<a href="https://www.saferinternet.org.uk/">https://www.saferinternet.org.uk/</a>	Contains a specialist helpline for UK schools and colleges
<a href="https://swgfl.org.uk/">https://swgfl.org.uk/</a>	Includes a template for setting out online safety policies
<a href="https://www.internetmatters.org/">https://www.internetmatters.org/</a>	Help for parents on how to keep their children safe online
<a href="https://parentzone.org.uk/home">https://parentzone.org.uk/home</a>	Help for parents on how to keep their children safe online
<a href="https://www.childnet.com/resources/cyberbullying-guidance-for-schools">https://www.childnet.com/resources/cyberbullying-guidance-for-schools</a>	Guidance for schools on cyberbullying
<a href="https://www.pshe-association.org.uk/">https://www.pshe-association.org.uk/</a>	Guidance and useful teaching resources covering online safety issues including pornography and the sharing of sexual images
<a href="https://educateagainsthate.com/">https://educateagainsthate.com/</a>	Practical advice for parents, teachers and governors on protecting children from extremism and radicalisation

<a href="https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation">https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation</a>	A briefing note for school on how social media is used to encourage travel to Syria and Iraq
<a href="https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis">https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis</a>	The UK council for child internet safety's website provides: <ul style="list-style-type: none"> <li>• Sexting advice</li> <li>• Online safety: questions for governing bodies</li> <li>• Education for a connected world framework</li> </ul>
<a href="#">NSPCC</a>	NSPCC advice for schools and colleges
<a href="https://www.net-aware.org.uk/">https://www.net-aware.org.uk/</a>	NSPCC advice for parents
<a href="https://www.common sense media.org/">https://www.common sense media.org/</a>	Independent reviews, age-ratings, and other information about all types of media for children and their parents
<a href="https://www.gov.uk/government/publications/searching-screening-and-confiscation">https://www.gov.uk/government/publications/searching-screening-and-confiscation</a>	Guidance to schools on searching children in schools and confiscating items such as mobile phones
<a href="https://www.lgfl.net/default.aspx">https://www.lgfl.net/default.aspx</a>	Advice and resources from the London Grid For Learning

#### 48. ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

This policy is reviewed at least once annually, and any deficiencies or weaknesses in arrangements remedied without delay. Copies are made available to all parents via the School website.

- Designated Safeguarding Leads and Deputy regularly attend the Independent Schools Safeguarding Forum
- Designated Safeguarding Leads subscribe to on line safeguarding in schools bulletins
- Safeguarding is a regular item on all staff meeting agendas
- Safeguarding is included on every governors' meeting agenda
- Annual safeguarding review of procedures and practices conducted by all Designated Safeguarding Leads and Deputy, the Headmaster and the Governor with responsibility for safeguarding
- Reviews of child protection arrangements undertaken frequently and any deficiencies or weakness remedied without delay
- Termly report to the Governors about child protection procedures and the efficiency with which the related duties have been discharged

## 49. RELEVANT POLICIES

To underpin the values and ethos of Town Close House School and our intent to ensure that pupils at our school are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Anti-Bullying
- Attendance
- Behaviour
- Whistleblowing
- Recruitment, selection and disclosure
- Use of reasonable force
- Email acceptable use
- IT acceptable user
- Security
- Health and Safety
- First aid
- Intimate care
- Pupil supervision
- Educational visits
- Action in the Event of a Lost Child

The Code of Conduct and Handbook for Staff contains further information for staff.

## 50. STATUTORY FRAMEWORK

This policy has been devised in accordance with the following legislation and guidance:

- Working Together to Safeguard Children DfE (July 2018)
- Norfolk Safeguarding Children Partnership procedures
- Norfolk Safeguarding Children Partnership Protocol: Allegations against Persons who work with children
- Dealing with Allegations of Abuse against Teachers and other Staff, DfE 2012
- Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings (May 2019)
- Keeping Children Safe in Education September 2019
- What to do if you're worried a child is being abused. Advice for practitioners. March 2015
- Information sharing. Advice for practitioners providing safeguarding services. DfE July 2018
- Norfolk Channel Procedures
- The Counter-Terrorism & Security Act 2015
- 'Revised Prevent Duty Guidance: for England & Wales', HM Government (2015)
- ['Promoting fundamental British values as part of SMSC in schools: Departmental advice for maintained schools'](#) DfE (2014)
- Children Act 1989

- Disqualification under the Childcare Act 2006 (by association)
- 'Mandatory Reporting of Female Genital Mutilation – procedural information' (October 2015) Home Office
- Early Years Foundation Stage (EYFS) Statutory Framework – April 2017
- Children Missing Education Statutory Guidance – September 2016
- Multi-Agency Guidance of FGM – April 2016
- The use of social media for on-line radicalisation - July 2015
- The Prevent duty: Departmental advice for schools and childcare providers – June 2015
- Sexual violence and sexual harassment between children in schools and colleges DfE (May 2018)
- Teaching online safety in school – DfE (June 2019)

## APPENDIX i

### INDICATORS OF ABUSE

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

#### Emotional Abuse

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

## **Neglect**

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. This does not mean that their children are being neglected. Neglect involves on-going, severe failure to meet a child's needs. The majority of these signs and symptoms can occur across any age group.

### Physical signs:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- The child seems underweight and is very small for their age
- The child is poorly clothed, with inadequate protection from the weather
- Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference
- Signs of malnutrition include wasted muscles and poor condition of skin and hair
- Children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment
- Failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet, or they may present with obesity through inadequate attention to the child's diet
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include the failure to care for the individual needs of the child including any additional support the child may need as a result of any disability

### Behavioural signs:

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- If they are often absent from school for no apparent reason
- If they are regularly left alone, or in charge of younger brothers or sisters
- Lack of stimulation can result in developmental delay e.g. speech delay
- Craving attention or ambivalent towards adults, or may be very withdrawn
- Delayed development and failing at school
- Difficult or challenging behaviour

## **Physical Abuse**

Always obtain a medical diagnosis regarding any suspected abusive injury. No injury is 100% symptomatic of abuse. Look for unexplained recurrent injuries or burns, improbable excuses or refusal to explain injuries.

Physical signs:

- Bald patches
- Bruises and black eyes
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns
- General appearance and behaviour of the child may include:  
concurrent failure to thrive – measure height and weight  
frozen watchfulness – impassive facial appearance of the abused child who carefully tracks the examiner with his eyes
- Consider the age of the child:  
Any bruising to a young baby – it is unusual for a child under the age of one year to sustain a fracture accidentally
- Injuries that are not consistent with the story – too many, too severe, wrong place or pattern, child too young for the activity described
- Bruising:  
Bruising patterns can suggest gripping (finger marks), slapping or beating with an object  
Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury  
Bruising on black children will more difficult to identify
- Mongolian blue spots may be mistaken for bruises. The Mongolian spot is a congenital developmental condition exclusively involving the skin. Usually, as multiple spots or one large patch, it covers one or more of the lower back, the buttocks, flanks and shoulders. Mongolian spot is prevalent among Mongols, Turks and other Asian groups, such as the Chinese, Korean, Japanese etc. Nearly all East Asian infants are born with one or more Mongolian spots. Mongolian blue spot usually fades over the years and is most frequently gone by the time the child reaches adolescence.
- Recent research indicates that bruises cannot be aged accurately. Estimates of the age of the bruise are currently based on an assessment of the colour of the bruise with the naked eye

Other injuries:

- Bite marks may be evident from an impression of teeth
- Small circular burns on the skin suggest cigarette burns
- Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
- Red lines occur with ligature injuries

- Tearing of the frenulum of the upper lip can occur with force feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate
- Retinal haemorrhages can occur with head injury and vigorous shaking of a child
- Fractured ribs – rib fractures in a young child are suggestive of non-accidental injury
- Other fractures – spiral fractures of the long bones are suggestive of non-accidental injury

#### Behavioural signs:

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

#### **Sexual Abuse**

In young children behavioural changes may include:

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

Behavioural changes in older children might involve:

- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect, overreacting to criticism
- Marked changes in the child's general behaviour. E.g. they may become unusually quiet and withdrawn, or unusually aggressive, or they might start suffering from what may seem to be physical ailments but which can't be explained medically
- The child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected
- They may show unexpected fear or distrust of a particular adults or refuse to continue with their usual social activities
- The child may describe receiving special attention from a particular adult, or refer to a new 'secret' friendship with an adult or young person
- Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

Physical signs and symptoms for any child could be:

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

### **Child Sexual Exploitation**

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity

- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault

### **Forced Marriage**

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party.

## **Female Genital Mutilation**

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

### Mandatory Reporting on Known Cases of FGM – October 2015

From 31st October 2015, all regulated professionals (health, teachers, social workers) are required to report all **known** cases of FGM in girls under 18s which they identify in the course of their professional work direct to the police. In this situation, you must report your concerns to the police without delay and notify the Designated Safeguarding Lead (DSL) within school thereafter.

A verbal report can be made to the police by dialling 101.

Where there is a risk to life or likelihood of serious immediate harm, professionals should dial 999

The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies.

This is a personal duty; it cannot be transferred to anyone else.

Failure to report is not a criminal offence but may lead to local disciplinary proceedings.

Please ensure that you read the Home Office guidance, 'Mandatory Reporting of Female Genital Mutilation – procedural information' (October 2015) to fully understand your responsibilities in this area.

### **What is FGM?**

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

#### **Four types of procedure:**

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area

### **Why is it carried out?**

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour

- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

### **Is FGM legal?**

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

Circumstances and occurrences that may point to FGM happening:

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

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 urinal tract infection
- Disclosure

### **The 'One Chance' rule**

As with Forced Marriage there is the 'One Chance' rule. It is essential that we take action **without delay**.

**APPENDIX ii**



**Recording Form for Safeguarding Concerns**

Staff, volunteers and regular visitors are required to complete this form and pass it to one of the DSLs if they have a safeguarding concern about a child in our school.

Full name of child	Date of Birth	Tutor/Form group	Your name and position in school
<b>Nature of concern/disclosure</b>			
Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said:			
Was there an injury? Yes / No		Did you see it? Yes / No	
Describe the injury:			
Have you filled in a body plan to show where the injury is and its approximate size?			Yes / No
Was anyone else with you?		Who?	
Has this happened before?		Did you report the previous incident?	
Who are you passing this information to?		Name:	Date:
		Position:	Time:
Your signature:			Date:

Action taken by DSL:

Referred to:

Attendance  
Improvement  
Officer

Police

School Doctor

Social Services

Connexions

Parents

Other

<input type="checkbox"/>						
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

Parents informed? Yes / No (If No, state reason)

Feedback given to...?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------	--------------------------

Pastoral team

Tutor

Student

Person who recorded disclosure

Full name:

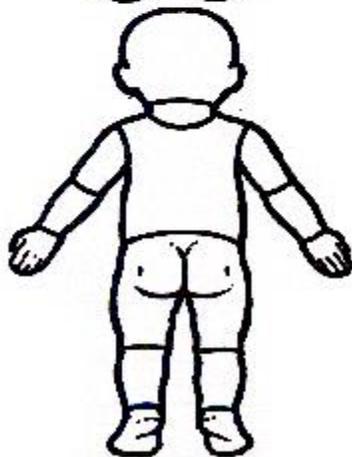
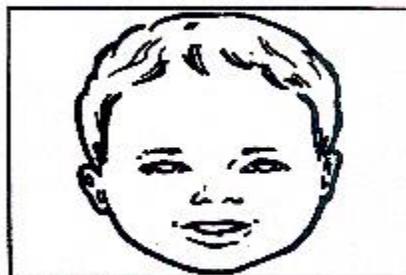
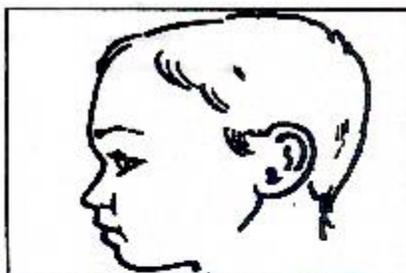
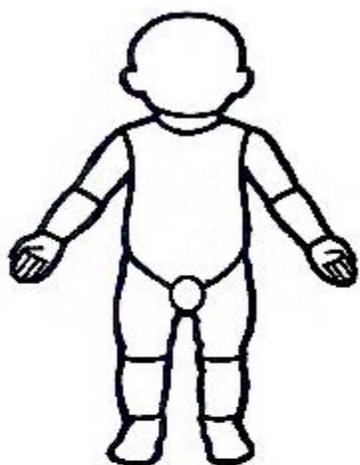
DSL Signature:

**APPENDIX iii**

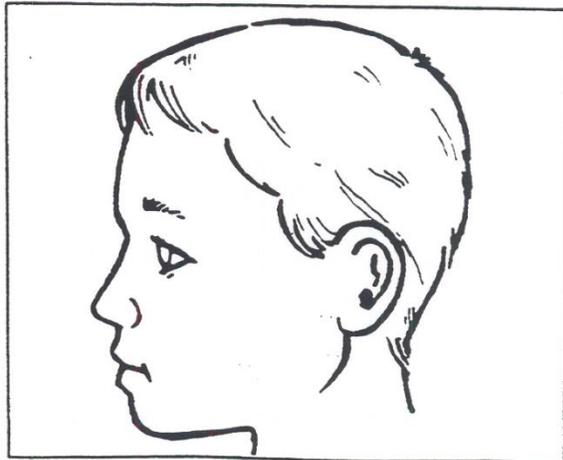
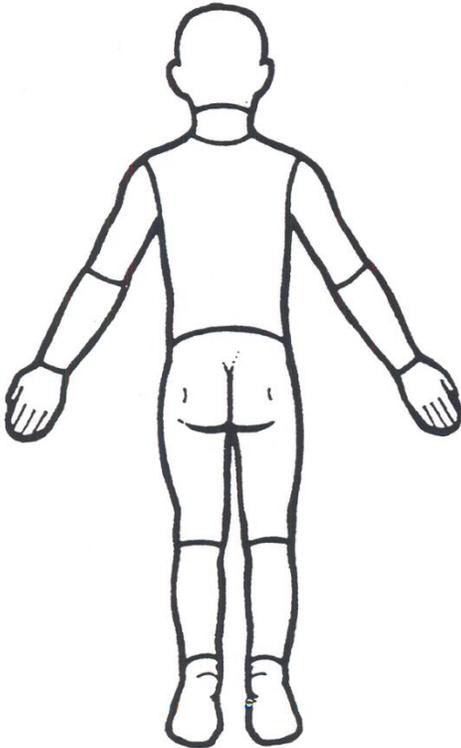
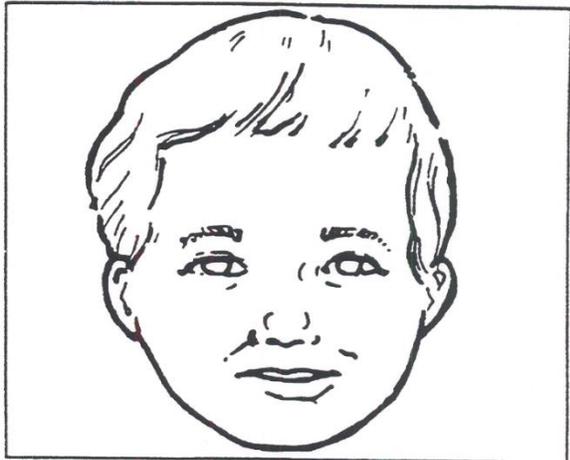
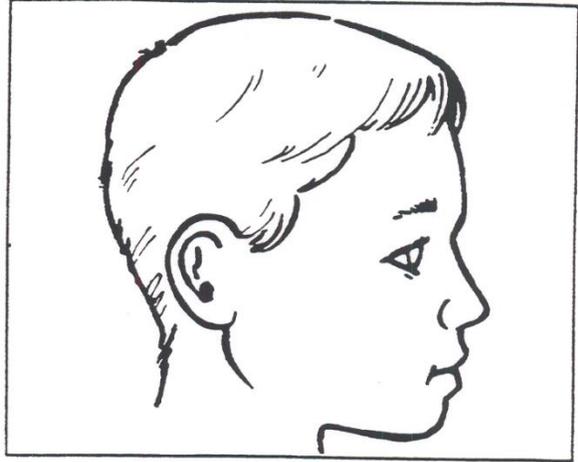
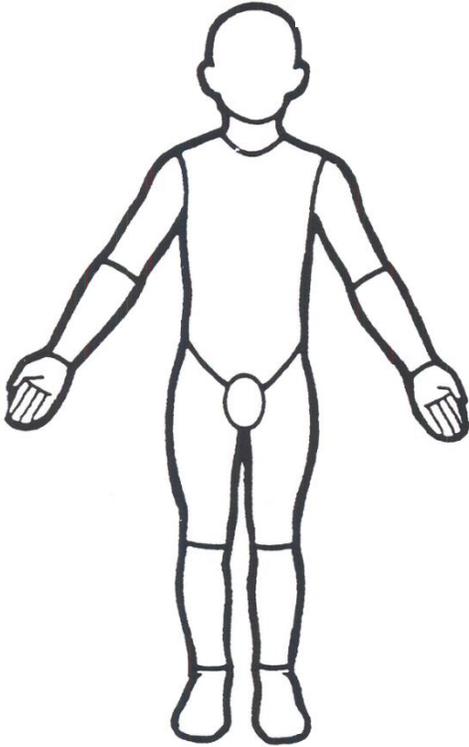
**Body Map – to be used with young children (EYFS)**

Child's Name:

Young Child



Child's Name:



## Appendix iv: Warning Signs/Indicators of Concern with regard to extremism

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors. It is vital that school staff are able to recognise those vulnerabilities. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Factors which may make pupils more vulnerable may include:

- **Identity Crisis:** the pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- **Personal Crisis:** the pupil may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- **Personal Circumstances:** migration; local community tensions and events affecting the pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations:** the pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- **Experiences of Criminality:** involvement with criminal groups, imprisonment, poor resettlement or reintegration.
- **Special Educational Need:** pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

Pupils who are vulnerable to radicalisation may also be experiencing:

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

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

- Being in contact with extremist recruiters and/or spending increasing time in the company of other suspected extremists;
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- Pupils accessing extremist material online, including through social networking sites;
- Possessing or accessing materials or symbols associated with an extremist cause;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Pupils voicing opinions drawn from extremist ideologies and narratives, this may include justifying the use of violence to solve societal issues;
- Graffiti symbols, writing or art work promoting extremist messages or images;
- Significant changes to appearance and/or behaviour increasingly centred on an extremist ideology, group or cause;
- Changing their style of dress or personal appearance to accord with the group;
- Attempts to recruit others to the group/cause;
- Using insulting to derogatory names for another group;
- Increase in prejudice-related incidents committed by that person – these may include:
  - physical or verbal assault
  - provocative behaviour
  - damage to property
  - derogatory name calling
  - possession of prejudice-related materials
  - prejudice related ridicule or name calling
  - inappropriate forms of address
  - refusal to co-operate
  - attempts to recruit to prejudice-related organisations
  - condoning or supporting violence towards others.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance;
- Partner schools, local authority services, and police reports of issues affecting pupils in other schools.

Appendix v:

**Person Vulnerable to Radicalisation (VTR) Referral Form** taken from  
Prevent Norfolk Practitioners' Quick Guide: safeguarding individuals Vulnerable to Radicalisation  
(VTR) and referral process  
May 2019



RESTRICTED WHEN COMPLETE

<b>Section 1: Person referring to complete</b> (please expand boxes as required)	
<b>Subject's full Name</b> (include all known inc alias/maiden if relevant)	
<b>Date and place of birth</b>	
<b>Full Address</b>	
<b>Spouse/Partner/Parents' names/D.O.B</b>	
<b>Children/Siblings names/D.O.B</b>	

<b>Reason for Referral</b>

<b>Background and risk issues - Page 4 offers guidance notes(include chronology if known)</b>
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Faith / Ideology	
Personal / emotional & Social	
Risk / Protective factors	
<b>Referrers full name, role, contact details&amp; date submitted.</b>	Date:

**Once completed, email Norfolk Multi Agency Safeguarding Hub:**

[MASHSupervisors@norfolk.pnn.police.uk](mailto:MASHSupervisors@norfolk.pnn.police.uk)

## Guidance notes for completing this referral form

This form is to help you refer concerns about an individual who may be vulnerable to being drawn into terrorism. Below are questions which may help you to quantify and structure your concerns. The list is not exhaustive and other factors may be present but they are intended as a guide to help communicate your professional judgement about what has led you to make this referral.

### **Faith / ideology**

Are they new to a particular faith / faith strand?

Do they seem to have naïve or narrow religious or political views?

Have there been sudden changes in their observance, behaviour, interaction or attendance at their place of worship / organised meeting?

Have there been specific examples or is there an undertone of “Them and Us “ language or violent rhetoric being used or behaviour occurring?

Is there evidence of increasing association with a closed tight knit group of individuals / known recruiters / extremists / restricted events?

Are there particular grievances either personal or global that appear to be unresolved / festering?

Has there been an increase in unusual travel abroad without satisfactory explanation?

### **Personal / emotional / social issues**

Is there conflict with their families regarding religious beliefs / lifestyle choices?

Is there evidence of cultural anxiety and / or isolation linked to insularity / lack of integration?

Is there evidence of increasing isolation from family, friends or groups towards a smaller group of individuals or a known location?

Is there history in petty criminality and / or unusual hedonistic behaviour (alcohol/drug use, casual sexual relationships, and addictive behaviours)?

Have they got / had extremist propaganda materials (DVD's, CD's, leaflets etc.) in their possession?

Do they associate with negative / criminal peers or known groups of concern?

Are there concerns regarding their emotional stability and or mental health?

Is there evidence of participation in survivalist / combat simulation activities, e.g. paint balling?

### **Risk / Protective Factors**

What are the specific factors which are contributing towards making the individual more vulnerable to radicalisation? E.g; mental health, language barriers, cultural anxiety, impressionability, criminality, specific grievance, transitional period in life etc.

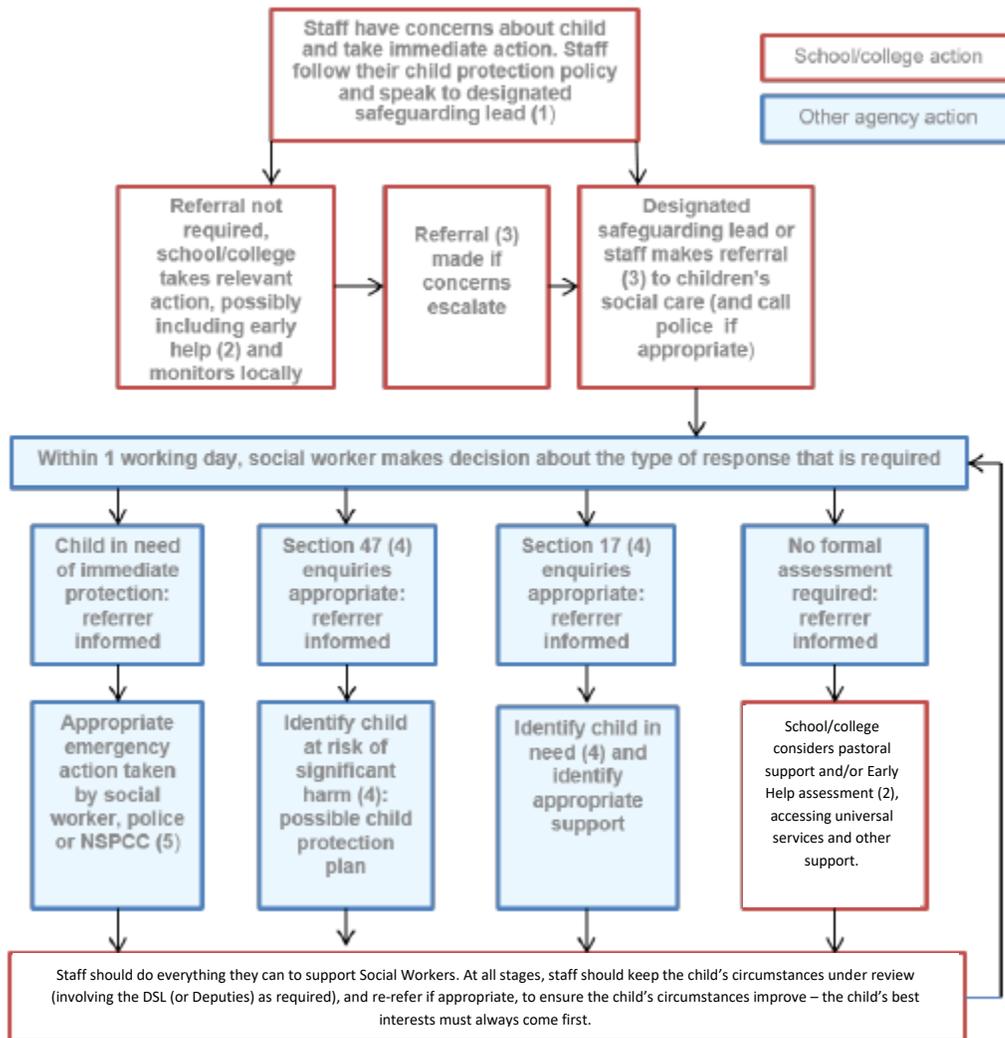
**Action when a child has suffered or is likely to suffer harm.**

This diagram illustrates what action should be taken and who should take it where there are concerns about a child.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. Anybody can make a referral.

Diagram and following notes from KCSIE 2021

**Actions where there are concerns about a child**



1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
5. This could include applying for an Emergency Protection Order (EPO).